

Assessment of Effects to Historic Properties

Proposed Undertaking In and Adjacent to Jackson Park
Jackson Park, Chicago, Illinois

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1.0 Introduction

This Assessment of Effects (AOE) report documents the assessments of effect to National Register of Historic Places (NRHP) listed and eligible historic properties associated with the Proposed Undertaking In and Adjacent to Jackson Park. This report assesses potential effects to above-ground historic properties in accordance with 36 CFR 800.5 and is prepared for the National Park Service (NPS) and the Federal Highway Administration (FHWA). The proposed Federal actions by the NPS and the FHWA are described in Sections 1.2 and 1.3, respectively. The Illinois Department of Transportation (IDOT), through a stewardship and oversight agreement with the FHWA, assists in reviewing the compliance of a project with environmental laws and conducts coordination with necessary state officials, including the State Historic Preservation Officer (SHPO). Consistent with 36 CFR 800.2(a)(3), the information, analyses, and recommendations in this report were developed by the City of Chicago Department of Planning and Development (DPD) with assistance from CNECT, LLC. and Quinn Evans Architects as consultants. Staff from IDOT, who meet the Secretary of the Interior's Qualification Standards, reviewed the report and provided guidance to ensure the contents met applicable standards and guidelines. Federal Agency officials from NPS and FHWA provided guidance in preparation of the report and reviewed the contents to ensure it meets applicable standards and guidelines.

Section 106 compliance activities completed for the project to date include the delineation of the Area of Potential Effects (APE) and identification of historic properties. Above-ground historic properties were evaluated and identified in a Historic Property Inventory (HPI) Report. See Section 2.0 for a summary of the HPI activities. Section 4.0 summarizes public and agency coordination efforts to date. The Archaeological APE limits were defined by the limits of potential ground disturbance as a result of the proposed actions. A map of the Archaeological APE is available on the project website (www.tinyURL.com/JPIimprovements). An archaeological survey was conducted in 2017 following Illinois and Federal guidelines during which no archaeological sites were identified that warranted eligibility for the NRHP. The final Archaeology Report is available on the project website (www.tinyURL.com/JPIimprovements). SHPO provided concurrence with the Archaeological findings on March 28, 2018 which can be viewed under Agency Correspondence in Appendix D.

The Assessment of Effects is being made available to the consulting parties and the public for a 30-day review and comment period. The FHWA and NPS will consider the comments from the consulting parties and the public and as appropriate address them in the final Assessment of Effects. The final Assessment of Effects will be made available to the consulting parties and the public and then FHWA and NPS will proceed to the next step in the Section 106 process (See Section 6.0).

1.1 Undertaking Overview and Description

The City of Chicago and Federal actions assessed in this report occur in and adjacent to Jackson Park in the City of Chicago. See Exhibit 1 in Appendix A. For the purposes of assessing effects to historic properties under Section 106, these actions are collectively considered “the undertaking”. The Federal actions include an amendment to the Urban Parks and Recreation Recovery (UPARR) agreements by the National Park Service (NPS) and the authorization of Federal-Aid Highway Program Funds by the Federal Highway Administration (FHWA). These proposed Federal actions occur in response to decisions made by the City of Chicago (City). The City proposes to allow for the construction of the Obama Presidential Center (OPC) in Jackson Park. The City is also proposing changes to roadways within Jackson Park. Certain changes proposed by the City do not involve Federal funding and therefore only require local approval, as there is no additional federal approval authority associated with those projects or activities. Specifically, the decision to locate the OPC in Jackson Park, the design of the OPC site and the buildings within it, and the closures of roadways in Jackson Park do not require any federal approvals.

The component actions that comprise the undertaking are briefly described in the following sections.

1.1.1 City of Chicago Actions

1.1.1.1 *Obama Presidential Center*

As mentioned, the City proposes to allow for the construction of the OPC in Jackson Park. The OPC site is planned on the east side of Stony Island Avenue between 59th and 62nd Streets, and is approximately 19.3 acres in size. See Exhibits 2-4 in Appendix A. The OPC site includes four buildings that will occupy approximately 2.5 acres of the site, including a Museum, Forum, Library, and an indoor Program, Athletic and Activity Center (PAAC), in addition to a parking facility. The remainder of the OPC site will include new public pathways for pedestrians and bicyclists, a nature walk along the lagoon, a sloped great lawn that can accommodate a sledding hill, a fruit and vegetable garden and play areas. An underground parking facility is proposed within the OPC site boundary, east of Stony Island Avenue between the PAAC and the Library. A conceptual site plan of the OPC is provided as Figure 1 in Appendix B.

1.1.1.2 *Roadway Changes*

The City proposes the following permanent roadway closures within Jackson Park: Cornell Drive between 63rd Street (Hayes Drive) and 59th Street, the northbound section of Cornell Drive between 68th Street and 65th Street, Marquette Drive between Stony Island Avenue and Richards Drive, and the eastbound portion of Midway Plaisance between Stony Island Avenue and Cornell Drive. See Figure 2 in Appendix B. Closures of the eastbound Midway Plaisance and Cornell Drive between 63rd Street and 59th Street are necessary to accommodate the development of the OPC. The additional roadway closures will reduce the number of multilane roadways that currently divide Jackson Park to allow for a more continuous park.

The City also proposes improvements to the roadway, pedestrian, and bicyclist network to address the changes in travel patterns that arise from the proposed roadway closures and to improve public safety, access and circulation throughout the park. These are further described in Section 1.3.

1.1.1.3 Recreation Changes

As a result of proposed changes in Jackson Park, recreation opportunities will be impacted. The impacted area is depicted by a shaded box on the OPC conceptual site plan in Figure 1 of Appendix B. NPS will consider opportunities lost and gained as part of its decision-making analysis.

In summary, the OPC project would affect all or a small portion of five recreational elements currently on the site: (1) a portion of the footprint occupied by the existing track and field facility; (2) open recreation space, including existing trails used for biking or walking; (3) the existing picnic grove; (4) a small strip of the Perennial Garden/Women's Garden; and (5) the 62nd Street playground. Each of these elements will be reconfigured or offset by replacement property, uses, and opportunities both on the OPC site as well as elsewhere within Jackson Park and the Eastern Midway Plaisance:

Opportunities related to the existing track and field will be replaced at a new track and field facility within Jackson Park.

The Picnic Grove is used for picnicking and sitting, walking, gathering, pick-up games (such as soccer), play, and special events. Because it will be displaced by elements of the OPC project, the Picnic Grove's uses will be recouped through multiple picnicking opportunities available across the several areas on the larger-OPC site amenable for picnicking. These include the Lagoon View Lawn, the Great Lawn, and an area for picnicking in and around the Library roof, among others. There will be a minimum of one acre of picnicking space.

The Perennial Garden/Women's Garden is used for gardening, aesthetic enjoyment, and commemorations and for sitting, walking, nature observation, meditation, gathering, and play. It will be temporarily impacted by construction. The garden will be replaced with improved accessibility upon completion of the OPC.

Opportunities for informal recreation will also be impacted by the OPC construction. Such areas have no formal uses, but are used informally for sitting, walking, gathering, pick-up games (soccer, other), play, and for landscaping or as buffer between recreation areas and sidewalks, paths, and roadways. These opportunities will continue to exist on the OPC site as well as in new landscaped areas made available by the closure of certain roads on the site, as discussed below.

Opportunities for play on a structured facility will also be reconfigured. The 62nd Street playground will be relocated and expanded by the Foundation as part of the OPC construction to the immediate northwest of the current location, with an enlarged footprint and all new equipment, including custom-made experiential play features.

The project includes the development of new recreational opportunities. The Program, Athletic and Activity Center will provide a new opportunity for public recreational programs. Other new recreation amenities proposed for the OPC project include: a sledding hill, great lawn, nature trail, and woodland walk.

The proposed roadway changes may affect various open park spaces used for informal recreation as well as some sidewalks and pathways used for walking, jogging, and biking. The park spaces that would be lost to roadway improvements are linear, narrow and mainly serve as landscape buffer space between roadways and more functional recreation areas nearby. Although some pathways and sidewalks will be affected by the project, new pathways and sidewalks are proposed to replace the affected pathways and sidewalks while also providing improved connectivity and circulation within the park. Proposed underpasses will also facilitate better connectivity and safety. As part of the OPC site development, the City intends to close certain roadways within Jackson Park and convert those roadways into open space. The City proposes to make these new areas of open space available to provide replacement recreation opportunities.

Finally, the City proposes to dedicate acreage as replacement recreation opportunity on the eastern portion of the Midway Plaisance bounded by the North and South Midway Plaisance, Stony Island Avenue, and the Metra railway. This area is approximately 5.2 acres. It has two mixed-use trails and a sidewalk. The majority of the eastern Midway is an open lawn lined with trees. Within the open space are park benches, trees, an informational kiosk, the Cheney Goode Memorial, and an isolated low-quality wetland. The Memorial consists of a bench and sundial placed on the western side of the eastern Midway Plaisance in 1932. The Cheney Goode Memorial location is noted on Figure 3 of Appendix B. The westernmost portion of the lawn area has an elevated landscape containing dense plantings and trees that provide screening of the Metra Electric Railway.

The City proposes modifying the Eastern Midway to accommodate a combination of open space and a formal play area. In order to accomplish this project, the central area would reduce in size. The western side of the historic sunken lawn would be altered with the addition of a play area and walks. The new fenced play area and placement of walks, trees, and recreational features would reduce the central lawn panel. Addition of trees at the margins of the open space would result in a minor modification of the site and the existing wetland would be filled to allow for enhanced recreational use. The City has committed that there will be no alterations to the configuration of existing roadways or walking paths. A concept plan of the proposed recreational changes within the Eastern Midway is presented in Figure 3 of Appendix B. The future public process regarding the changes on the Eastern Midway will carefully consider the historic nature of the Midway Plaisance and seek to minimize any potential effects to historic properties, pathways, and plantings, to the extent possible.

1.2 National Park Service Action

The purpose of the NPS action is to amend the original Urban Parks and Recreation Recovery (UPARR) agreements. The UPARR program, administered by the NPS, provided grant funds to Jackson Park in the early 1980's. Upon receiving these grants, the City committed to maintaining public recreation uses within the UPARR boundary in Jackson Park. Any changes within Jackson Park to a use that is not public recreation within the context of UPARR must be reviewed and approved by NPS. NPS approval is conditioned by the change being in accord with the current local park plan, adequate replacement recreation property, and reasonably equivalent recreation opportunities available on that replacement property.

The City's decision to locate the OPC within Jackson Park and improve the roadway network in and around Jackson Park changes areas that were previously in recreation use to something else, thus triggering a partial conversion. As long as the City identifies adequate recreation replacement to account for public recreation losses associated with the OPC and roadway improvements, NPS will amend the original UPARR agreements to exclude areas no longer in recreation and expand the boundary to include the recreation replacement.

Evaluation of the NPS action includes the review of current recreation uses within the identified conversion. The UPARR conversion areas include a portion of the OPC site as well as areas where proposed roadway widening or realignment occurs. These conversion areas are shown and noted on Exhibits 2-4 in Appendix A. Loss of recreation must be replaced with new recreation opportunities that ensure adequate recreation properties and opportunities of reasonably equivalent usefulness and location.

NPS will review the proposed recreation uses associated with the replacement areas to determine if equivalent recreation opportunities are provided. These replacements are shown on Exhibits 2-4 in Appendix A. The NPS will evaluate and consider impacts associated with both the conversion and the replacement recreation prior to approving the recreation use changes and amending the UPARR agreements.

1.3 Federal Highway Administration Action

The purpose of the FHWA action is to (1) address changes in travel patterns resulting from closing roadways in Jackson Park and (2) improve bicycle and pedestrian access and circulation.

The FHWA administers the Federal-Aid Highway Program, which makes available federal funding to state departments of transportation and local agencies for roadway projects. The Chicago Department of Transportation (CDOT) proposes to use federal-aid highway funding for roadway construction activities to mitigate traffic impacts from the proposed closure of roadways within Jackson Park. Prior to the authorization of federal-aid highway funds, the FHWA must ensure the project meets all federal requirements, including but not limited to the National Environmental Policy Act (NEPA), Section 4(f) of the United States Department of Transportation (USDOT) Act of 1966, and Section 106 of the NHPA.

An alternatives analysis (available on the project website, www.tinyURL.com/JPIImprovements) considered a wide range of proposed improvements to meet the FHWA's purpose and need, while avoiding or minimizing impacts to historic properties. Generally, the roadway improvements considered under the proposed FHWA action occur along Lake Shore Drive, Hayes Drive, and Stony Island Avenue and their intersecting roadways. Proposed bicyclist and pedestrian improvements include five underpasses, additional trails, and enhanced access accommodations. This preliminary Preferred Alternative was found to best meet the project's purpose and need while also minimizing impacts to historic properties and other resources.

The proposed roadway, bicyclist, and pedestrian improvements considered under the FHWA action are shown on Exhibits 2-4 in Appendix A.

Collectively the actions by the City, NPS, and FHWA are considered "the undertaking," for the purposes of assessing effects to historic properties under Section 106.

2.0 Identification of Historic Properties within the Area of Potential Effects

2.1 Area of Potential Effect

The identification of above-ground historic properties began with the delineation of the Area of Potential Effects (APE). The APE boundaries were drawn to include the direct and indirect effects of the undertaking. The FHWA and NPS consulted with State Historic Preservation Office (SHPO), consulting parties, and the public in developing the APE boundaries.

The Historic Architecture APE was initially drawn to encompass all of Jackson Park, South Shore Cultural Center Park, a portion of the Midway Plaisance and Burnham Park, and generally one parcel along each of the streets bordering Jackson Park. Based on public input and SHPO consultation, the Historic Architecture APE was expanded to include a one-half mile radius around the OPC Museum Building (to capture potential viewshed impacts) and to include the entirety of the Midway Plaisance. The Historic Architecture APE is divided into two sub-areas: APE I east of the Illinois Central Railroad (ICRR) viaduct and APE II west of the viaduct. A map of the Historic Architecture APE is available on the project website. Further description of the Historic Architecture APE is provided in the Historic Properties Identification (HPI) Report, available on the project website (www.tinyURL.com/JPIImprovements).

2.2 Historic Properties in the Area of Potential Effects

A Historic Properties Identification (HPI) Report (July 10, 2018, available on the project website, www.tinyURL.com/JPIImprovements) was prepared to document above-ground historic resources identified within the Historic Architecture/Landscape APE.

Within the Historic Architecture APE, the HPI identified seven districts and 29 individual properties listed or eligible for listing on the NRHP. Four NRHP listed historic districts (Jackson Park/Midway Plaisance, South Shore Country Club Historic District, Promontory Point, and Hyde Park-Kenwood) and seven individually NRHP listed properties were identified. Evaluation of the surrounding architecture within the APE resulted in the identification of three NRHP eligible historic districts (Hyde Park East, Jackson Park Terrace, and South Shore E. 67th Street Apartment District) and twenty-two individually NRHP eligible properties.

Historic properties within the Historic Architecture APE can be seen on Exhibit 2 and are listed in Table 1 below. The draft and final HPI reports were made available for consulting parties and the public to provide input, and are available on the project website (www.tinyURL.com/JPIImprovements). The SHPO provided concurrence with the determinations of eligibility in the final HPI on July 10, 2018, which can be viewed under Agency Correspondence in Appendix D.

Table 1: Historic Properties Listed or Eligible for NRHP

Historic Property	Address	APE Subarea	NRHP Status [Year]
Jackson Park Historic Landscape District and Midway Plaisance	Roughly bounded by 67th Street, Stony Island Avenue, 56th Street, and Lake Michigan; 60th Street, Cottage Grove Avenue, 59th Street, Stony Island Avenue	I	Listed (Historic District) [1972]
Stony Island State Trust and Savings Bank/Stony Island Arts Bank	6760 S. Stony Island Avenue	I	Listed (Individually) [2013]
William Dexter Three-Flat	1549 E. 69th Place	I	Eligible (Individually) [2018]
Island Terrace Apartment Building	6430 S. Stony Island Avenue	I	Eligible (Individually) [2018]
Hyde Park Academy High School	6220 S. Stony Island Avenue	I	Eligible (Individually) [2018]
Jackson Park Terrace Historic District	Roughly bounded by 61st Street, Metra Electric Railroad, E. Public Way, and Stony Island Avenue	I	Eligible (Historic District) [2018]
Hyde Park-Kenwood Historic District	Roughly bounded by 59 th Street, Cottage Grove Avenue, 40 th Street, Metra Electric Railroad/Stony Island Avenue	I/II-A	Listed (Historic District) [1979]
South Shore Country Club Historic District (Currently known as the South Shore Cultural Center Park)	Roughly bounded by 71st Street, S. South Shore Drive, Lake Michigan	I	Listed (Historic District) [1975]
South Shore E. 67 th Street Apartment Historic District	Roughly bounded by S. South Shore Drive, 67th Street, one parcel south of 67th Street, one parcel west of Merrill Avenue	I	Eligible (Historic District) [2018]
Residences at 6700 S. Crandon Avenue	6700 S. Crandon Avenue	I	Eligible (Individually) [2018]

Historic Property	Address	APE Subarea	NRHP Status [Year]
Shoreline Apartments	2231 E. 67th Street	I	Listed (Individually) [2017]
Residences at 2201-2211 E. 67 th Street	2201-2211 E. 67th Street	I	Eligible (Individually) [2018]
Leonard Graff House	6700 S. Euclid Avenue	I	Eligible (Individually) [2018]
Dr. Paul Schutz House	6701 S. Bennett Avenue	I	Eligible (Individually) [2018]
Morris N. Fox Three-Flat	6700 S. Bennett Avenue	I	Eligible (Individually) [2018]
Residences at 6701 S. Constance Avenue	6701 S. Constance Avenue	I	Eligible (Individually) [2018]
Tower Court Apartments	6700-6708 S. Constance Avenue/ 1801-1811 E. 67th Street/ 6701-6711 S. Creiger Avenue	I	Eligible (Individually) [2018]
Hyde Park East Historic District	Roughly bounded by 56th Street, Metra Electric Railroad/one parcel west of S. Shore Drive, 54th Street/one parcel north of 56th Street, and S. Shore Drive	I	Eligible (Historic District) [2018]
Bret Harte Elementary School	1556 E. 56th Street	I	Eligible (Individually) [2018]
Windermere East Hotel/Apartments	1642-1660 E. 56th Street	I	Listed (Individually) [1982]
Jackson Towers	5555 S. Everett Avenue	I	Eligible (Individually) [2018]
Promontory Apartments	5530-5532 S. Shore Drive	I	Listed (Individually) [1996]

Historic Property	Address	APE Subarea	NRHP Status [Year]
The Flamingo on the Lake	5500 S. Shore Drive	I	Listed (Multiple Properties Listing) [1986]
Jackson Shore Apartments	5490 S. Shore Drive	I	Listed (Individually) [2010]
Shoreland Hotel	5454 S. Shore Drive	I	Listed (Multiple Properties Listing) [1986]
Promontory Point Historic District	Roughly bounded by 56 th Street (extended), S. Shore Drive, 54 th Street (extended), and Lake Michigan	I	Listed (Historic District) [2018]
Helstein House	5804-5806 S. Blackstone Avenue	II-A	Eligible (Individually) [2018]
Residence at 5812 S. Blackstone Avenue	5812 S. Blackstone Avenue	II-A	Eligible (Individually) [2018]
Stein Building	5825 S. Dorchester Avenue	II-A	Eligible (Individually) [2018]
Johnson House	5617 S. Kenwood Avenue	II-A	Eligible (Individually) [2018]
Center for Continuing Education (Graduate Student Housing/Keller Center)	1301-1311 E. 60th Street	II-B	Eligible (Individually) [2018]
Public Administration Building (Chapin Hall)	1313 E. 60th Street	II-B	Eligible (Individually) [2018]
St. Paul's Universalist Church/Shankman Orthogenics School	1375 E. 60th Street	II-B	Eligible (Individually) [2018]
University of Chicago Power Station	6053 S. Blackstone Street	II-B	Eligible (Individually) [2018]

Historic Property	Address	APE Subarea	NRHP Status [Year]
E. 62 nd Place Firehouse	1405-1407 E. 62nd Place	II-B	Eligible (Individually) [2018]
Pridmore & Stanhope-designed Greystone	6243 S. Woodlawn Avenue	II-B	Eligible (Individually) [2018]

3.0 Assessment of Effect

This section assesses the effects of the undertaking on historic properties. For detailed background and historic context information regarding each of the evaluated elements, see the Historic Properties Inventory (HPI) Report, which can be viewed on the project website (www.tinyURL.com/JPIimprovements).

Exhibit 2 in Appendix A depicts the listed and eligible historic properties in the APE that are assessed for possible adverse effects in this report. The activities involved with the undertaking are also depicted on Exhibits 2-4. Photographs of the historic properties to and from the undertaking are provided in Appendix C.

3.1 Methodology

3.1.1 Definitions and Guidelines

The assessment of effects proceeds by applying the “criteria of adverse effect” to historic properties within the area of potential effects. The criteria of adverse effect are described as follows (36 CFR 800.5(a)(1)):

An **adverse effect** is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property’s eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative.

Examples of adverse effects (36 CFR 800.5(a)(2)) on historic properties include, but are not limited to:

- a. physical destruction of or damage to all or part of the property;
- b. alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary’s standards for the treatment of historic properties (36 CFR part 68) and applicable guidelines;
- c. removal of the property from its historic location;
- d. change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance;
- e. introduction of visual, atmospheric or audible elements that diminish the integrity of the property’s significant historic features;

- f. neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- g. transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

To evaluate the effects of alterations to a historic property, the Secretary of the Interior has published *Standards for the Treatment of Historic Properties* (codified at 36 CFR 68) as well as *Guidelines for the Treatment of Cultural Landscapes*, which illustrates how to apply these standards to cultural landscapes. A cultural landscape is a geographic area associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values; small-scale features within the landscape may define the spatial character of the landscape as a whole. The Jackson Park Historic Landscape District and Midway Plaisance is an example of a cultural landscape. The *Standards* and *Guidelines* have been utilized in the assessment of effect to the Jackson Park Historic Landscape District and Midway Plaisance.

The assessment of each historic property will result in one of the three determinations: adverse effect, no adverse effect, or no effect. An adverse effect is determined if a potential direct, indirect, or cumulative effect meets the definition set forth above. A determination of no adverse effect means the undertaking's effect(s) do not meet the criteria described above, or conditions are imposed to avoid adverse effects. A determination of no effect means the undertaking has no impact on a particular historic property. The criteria of adverse effects is applied to determine if a potential effect is either adverse or not adverse; if there is no potential for an effect, justification is provided and the criteria of adverse effect need not apply.

If any adverse effects to a historic property are determined to occur as a result of direct, indirect, or cumulative effects from the undertaking, the overall project is determined to result in an Adverse Effect to Historic Properties.

3.1.2 Noise, Traffic, and Visual Analysis Methodology

A Highway Traffic Noise Analysis (available on the project website, www.tinyURL.com/JPIImprovements) was conducted for the project to determine if any noise impacts at particular locations within and adjacent to Jackson Park and the Midway Plaisance would occur as a result of the FHWA action. Conclusions related to audible changes near historic properties are drawn from this study.

Sound pressure level, also referred to as "noise level", is measured in units called decibels (dBA). For the average human with normal hearing, a 3-dBA change in noise level is barely perceptible, especially if the change occurs gradually over time. A 5-dBA change in noise level is perceptible if the change occurs within a short span of time, but less perceptible if the change occurs gradually over time. A 10-dBA increase or decrease is perceptible and subjectively described by most humans as "twice as loud" or "twice as soft" as the original level. The distance from a sound source is also a factor in its magnitude. With respect to traffic on a typical highway, a doubling of the distance between the highway and the receptor will reduce the noise level by approximately 3 dBA to 4.5 dBA. For example, if the noise level at

50 feet from a highway is 70 dBA, the noise level at 100 feet would be approximately 65.5 dBA to 67 dBA. These concepts are further described within the Highway Traffic Noise Analysis Report.

Noise impacts during construction are also discussed as part of the Highway Traffic Noise Analysis. In general, construction noise is considered to be relatively temporary in nature, and perceptible changes in noise levels may be experienced during construction. However, the Illinois Department of Transportation proposes mitigation strategies to minimize or eliminate the effects of construction noise as part of the *Standard Specifications of Road and Bridge Construction* and *Highway Traffic Noise Assessment Manual*. These strategies should be considered and implemented if feasible during the design planning of the project, and are further detailed in the Highway Traffic Noise Analysis Report.

For each of the historic properties evaluated, the change in noise level (post-construction) as a result of the FHWA action is discussed and the effect of highway traffic noise on the property, if any, is described.

A Traffic Impact Study (TIS)¹ was conducted to determine the effects of traffic diversions as a result of the City's proposal to close roadways within Jackson Park. Conclusions related to the effects of traffic volume changes are drawn from this study. Primarily as a result of closing Cornell Drive, the TIS describes how traffic is anticipated to be diverted primarily to Lake Shore Drive to the east, Stony Island Avenue to the west, and other north-south roadways outside of the immediate area (including the Dan Ryan Expressway). Each of these roadways are primary routes that serve similar types of regional traffic and will not experience perceptible changes in traffic. Traffic volumes are not anticipated to be largely dispersed to lesser volume roadways through historic districts.

A visual impact analysis of the OPC Museum Building from each historic property was conducted using Google Earth and Google Sketchup. A to-scale model of the OPC Museum Building was built using Google Sketchup and imported into Google Earth where street-level viewpoints were captured from each historic property or feature toward the Museum Building. The ability to capture viewpoints from above-ground level (i.e. upper-levels of a multi-story building) is not available, however, possible views of the OPC Museum Building from elevated viewpoints are noted, as applicable, for historic properties. The visual impact analysis is referenced in the discussion of effects to historic properties and/or features.

3.1.3 Determinations of No Effects

Based on refinements in the scope of undertaking, some historic properties within the APE have no potential to be affected due to their considerable distance from the undertaking. These properties are presented in Table 2.

The properties within the APE that are listed in Table 2 will not experience any physical changes or alterations to any of the characteristics of the property that qualifies it for inclusion in or eligibility for the National Register. Additionally, an evaluation of indirect effects to the properties listed in Table 2,

¹ Sam Schwartz Engineering, LLC. *Jackson Park Revitalization Traffic Impact Study Final Report*. (February 2018). Retrieved from https://www.chicago.gov/content/dam/city/depts/dcd/supp_info/jackson/CDOT-Traffic-Impact-Study.pdf

including effects from highway traffic noise, traffic diversions, and visual effects, has determined that none of these properties experience changes or alterations that diminish the integrity of these properties. Therefore, the undertaking will have **no effect** to the properties presented in Table 2. Further description of the justifications of indirect effects follow Table 2.

Table 2: Historic Properties with Limited Potential for Effects

Property Name	Effect Finding	Justification
Center for Continuing Education (Graduate Student Housing/Keller Center)	No Effect	No anticipated or perceptible changes in noise levels; Partial view of OPC Museum Building will not alter integrity of setting
Public Administration Building (Chapin Hall)	No Effect	
St. Paul's Universalist Church/Shankman Orthogenics School	No Effect	
Promontory Point Historic District	No Effect	No perceptible changes in noise levels; Partial view of OPC Museum Building will not alter integrity of setting
Hyde Park East Historic District	No Effect	No anticipated or perceptible changes in noise levels; Partial or possible view of OPC Museum Building will not alter integrity of setting
Bret Harte Elementary School	No Effect	
Windermere East Hotel/Apartments	No Effect	
Jackson Towers	No Effect	
Promontory Apartments	No Effect	
The Flamingo on the Lake	No Effect	
Jackson Shore Apartments	No Effect	
Shoreland Hotel	No Effect	
South Shore E. 67 th Street Apartment Historic District	No Effect	No perceptible changes in noise levels; Possible views of OPC Museum Building will not alter integrity of setting
Residences at 6700 S. Crandon Avenue	No Effect	
Shoreline Apartments	No Effect	
Residences at 2201-2211 E. 67 th Street	No Effect	
South Shore Country Club Historic District (Currently known as the South Shore Cultural Center Park)	No Effect	No anticipated or perceptible changes in noise levels; No view of OPC Museum Building
Leonard Graff House	No Effect	
Dr. Paul Schutz House	No Effect	
Morris N. Fox Three-Flat	No Effect	
Residences at 6701 S. Constance Avenue	No Effect	
Tower Court Apartments	No Effect	
Helstein House	No Effect	
Residence at 5812 S. Blackstone Avenue	No Effect	
Stein Building	No Effect	

Property Name	Effect Finding	Justification
Johnson House	No Effect	
University of Chicago Power Station	No Effect	
Pridmore & Stanhope-designed Greystone	No Effect	

According to guidance from the FHWA, highway traffic noise typically does not cause impacts at distances greater than 500 feet, therefore, the Highway Traffic Noise Analysis considers the effects of highway traffic noise within a 500-foot boundary of the undertaking. Some of the identified historic properties, particularly those west of the Metra Electric Rail line, are therefore not evaluated in the Highway Traffic Noise Report, nor are they anticipated to be affected by highway traffic noise as a result of the undertaking. For the historic properties that are within the noise analysis boundary, the Highway Traffic Noise Analysis reports none of the properties listed within Table 2 are predicted to experience a perceptible change in noise levels.

As noted in Section 3.1.2, substantial increases in traffic volumes as a result of closing roadways within Jackson Park are not anticipated to occur on surrounding minor roadways. Specifically, traffic volumes along E. 67th Street, E. 56th Street, South Shore Drive, and the neighborhood roadway network north and south of the Midway Plaisance only experience minor traffic increases that will not be perceptible.

The visual impact analysis (Photo 37) demonstrates that the OPC Museum Building will be partially visible at street-level from some historic properties along 60th Street, west of the ICRR viaduct (Center for Continuing Education, Chapin Hall, St. Paul's Universalist Church). Views to and from the Midway Plaisance have been and will continue to be an important part of the setting that contributes to the significance of these properties. However, views to Jackson Park do not contribute to the integrity of the properties' setting due to the visual barrier of the ICRR viaduct and the properties' substantial distance from Jackson Park. Though minimally visible within the properties' distant viewsheds, the OPC Museum Building will not alter the setting of these historic properties.

As illustrated by Photo 38, the visual analysis indicates that the OPC Museum Building will be barely perceptible from the Promontory Point Historic District. The property has primary views of Lake Michigan to the east that contribute to its integrity of setting. Views southwest toward the Museum of Science and Industry will not be impacted. Therefore, the OPC Museum Building will not cause indirect effects that would alter the integrity of setting of the Promontory Point Historic District.

As shown in Photo 39, the street-level visual analysis demonstrates that the OPC Museum Building is minimally visible from the western corner of the Hyde Park East Historic District/Bret Harte Elementary School. While not visible at street-level, it is possible that OPC Museum Building and other portions of the OPC site development would be visible from some units of the upper levels of historic properties within this district, particularly those along E. 56th Street (Photo 40) (Windermere East Hotel/Apartments, 1700 E. 56th Street, Jackson Towers). Views to and from Jackson Park have been an important part of the setting that contributes to the significance these historic properties. While views of greenspace within Jackson Park will be impacted, the modern building is proposed along the edge of

Jackson Park within close proximity to the urban context which includes other tall buildings of various ages and designs. Thus, the OPC Museum Building will not adversely affect the integrity of setting for these properties at E. 56th Street. Other properties in this vicinity, including the Promontory Apartments, the Flamingo on the Lake, Jackson Shore Apartments, and the Shoreland Hotel, have primary views of Lake Michigan to the east. Jackson Park is not visible from these properties at either street-level (Photos 41 – 42) or from elevated viewpoints (Some buildings and units have no views towards Jackson Park, and others are blocked by adjacent high-rise buildings). The OPC Museum Building will not affect the views of these properties.

The visual analysis indicates that the OPC Museum Building will not be visible from the street-level of the properties along E. 67th Street (Photos 43 – 44, 46-47). However, the Museum Building may be visible from some units of some high-rise residential buildings within the South Shore E. 67th Street Apartments Historic District (such as units at 6700 S. Crandon Avenue, Shoreline Apartments, and the 2201-2211 E. 67th building.) While the OPC Museum Building may possibly be visible within distant views of these properties, the primary views of Jackson Park and Lake Michigan from these units will not be impacted. Therefore, there are no effects that would alter the integrity of setting of the South Shore E. 67th Street Apartments Historic District or properties therein.

Visual analysis demonstrates that the following properties will not have any visual effects of the OPC Museum Building (Photos 45 – 53):

- South Shore Country Club Historic District (Currently known as the South Shore Cultural Center Park)
- Leonard Graff House
- Dr. Paul Schutz House
- Morris N. Fox Three-Flat
- Residences at 6701 S. Constance Avenue
- Tower Court Apartments
- Helstein House
- Residence at 5812 S. Blackstone Avenue
- Stein Building
- Johnson House
- University of Chicago Power Station
- E. 62nd Place Firehouse
- Pridmore & Stanhope-designed Greystone

3.1.4 Historic Properties with Potential for Effects

The properties that could potentially be affected by the undertaking are listed in Table 3. The undertaking occurs within or directly adjacent to these historic properties. Each of the properties listed in Table 3 is assessed in Sections 3.3 and 3.4.

Table 3: Historic Properties with Potential for Effects

Historic Property	Effect Finding
Jackson Park Historic Landscape District and Midway Plaisance	Requires Effect Evaluation
Stony Island State Trust and Savings Bank/Stony Island Arts Bank	Requires Effect Evaluation
William Dexter Three-Flat	Requires Effect Evaluation
Island Terrace Apartment Building	Requires Effect Evaluation
Hyde Park Academy High School	Requires Effect Evaluation
Jackson Park Terrace Historic District	Requires Effect Evaluation
Hyde Park-Kenwood Historic District	Requires Effect Evaluation

3.2 Presentation of Assessment

Effects to historic properties that may be affected by the undertaking were assessed using the methodology described in Section 3.1. For each historic property, the effect determination is made for the undertaking, followed by a detailed description of the effects from the components of the undertaking, which includes the NPS action, FHWA action, and the City of Chicago actions (reasonably foreseeable/probable actions that are connected to the Federal actions). Reasonably foreseeable/probable actions that are connected to the Federal action include roadway closures, the development of the OPC site, and the track and field relocation.

Following the assessment of effects to each historic property, a cumulative impacts analysis is included to evaluate the effect of combining the effect from the undertaking along with projects that are likely to occur but are independent from this undertaking.

The Assessment of Effects evaluates the effects from the undertaking based on the scope of the Federal actions, as required by the Section 106 regulations. In this case, the Advisory Council on Historic Preservation (ACHP) advised FHWA and NPS take an expansive approach in describing the effects of other non-federal actions. The project sponsor (the City of Chicago) has agreed to this request and has included an evaluation of effects from related non-federal actions such as the development of OPC, roadway closures and movement of the track and field presented in the reasonably foreseeable/probable action section over which neither FHWA nor NPS has direct or indirect jurisdiction. This does not obligate either NPS or FHWA to address mitigation related to these reasonably foreseeable/probable actions. Furthermore, inclusion of this evaluation does not commit either NPS or FHWA to proceeding similarly with respect to other undertakings or obligate these agencies to future mitigation actions not related to the federal actions.

3.3 Jackson Park Historic Landscape District and Midway Plaisance

3.3.1 Description of Jackson Park Historic Landscape District and Midway Plaisance

The Jackson Park Historic Landscape District and Midway Plaisance is all part of one NRHP listed historic property located on the South Side of Chicago, Illinois. East of Stony Island Avenue, Jackson Park is roughly bounded by 67th Street, 56th Street, and Lake Michigan. West of Stony Island Avenue, the Midway Plaisance is roughly bounded by 60th Street, Cottage Grove Avenue, and 59th Street. The historic property (district) consists of two parks, Jackson Park and the Midway Plaisance, respectively to the east and west of S. Stony Island Avenue. The historic property is listed in the National Register of Historic Places (NRHP) for national and state significance according to Criterion C in the areas of landscape architecture, architecture, science, sculpture, and urban planning. Under Criterion C, the historic property embodies the distinctive characteristics of a type, period, or method of construction; or represents the work of a master; or possesses high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction.

The 2018 HPI report provides detailed background information on Jackson Park and the Midway Plaisance and its historical significance. In brief, the period of significance for Jackson Park and the Midway Plaisance is 1875 to 1968. The timeframe encompasses design and initial construction in the 1870s, the 1893 World's Colombian Exposition, subsequent redevelopment as a park based on the 1895-1897 plans by firms associated with Frederick Law Olmsted, Sr., and additions associated with the Works Progress Administration (WPA) and the Chicago Park District (CPD) through 1968. The seminal effort to create integrated parkland after the World's Columbian Exposition was the collaborative effort of the South Parks Commission with the Olmsted firm in its various manifestations: Olmsted, Olmsted & Eliot (1893-1897) and briefly F.L. and J.C. Olmsted (1897). The leading master landscape architects included Frederick Law Olmsted, Sr., his partners John Charles Olmsted, Charles Eliot and Frederick Law Olmsted, Jr., and collaborators Warren Henry Manning and Edward D. Bolton.

The HPI report identifies the resources that contribute to the historic property, including 3 sites, 16 buildings, 12 structures, and 5 objects. Landscape features that contribute to the significance of the property reflect the design intent and principles that the original designer, the firm of Frederick Law Olmsted, Sr., applied in order to create a public park serving as open space for use by the community. A full explanation of the historic design principles that informed the historic property's development is included on pages 11 and 12 of the HPI.

As community needs have changed, alterations to the park have been necessary to sustain its purpose, but the park continues to retain historic integrity because the overall effect of previous alterations retained consistency with the original design principles. For example, the early addition of major park amenities such as a golf course, gardens, bridges, buildings, and monuments reflected the original design principles, as did subsequent changes that fulfilled the 1905 and 1930 General Plans, which updated the original design. In later years, infill of the North and South Bayous and part of the East Lagoon removed visual and physical connection across the once-interconnected waterways, and the

intentional demolition of ornate bridges and buildings in the 1960s introduced changes that were incongruous with the historic park character. However, community advocacy related to these incongruities led to changes that helped reestablish the area as public open space.

In aggregate, the majority of alterations to the historic property over time have been consistent with the original design principles applied by the firm of Frederick Law Olmsted, Sr. As established by the HPI, the combination of changes made to date do not impair the integrity of the existing character-defining features reflecting the original design principles.

Photographs of Jackson Park and Midway Plaisance are provided in Photos 1 through 9 in Appendix C. Renderings for viewshed analyses of the OPC Museum Building are provided in Photos 25-29 in Appendix C.

3.3.2 Assessment of Effects on Jackson Park Historic Landscape District and Midway Plaisance

Individual resources and features of the historic property referenced in this assessment of effects are identified in Appendix A, Exhibit 3: Jackson Park and Midway Plaisance Contributing Resources and Exhibit 4: Jackson Park and Midway Plaisance – Referenced Cultural Landscape Features.

3.3.2.1 Effect Determination

The undertaking will have an **adverse effect** to Jackson Park Historic Landscape District and Midway Plaisance because it will alter, directly or indirectly, characteristics of the historic property that qualify it for inclusion in the National Register.

The significance of Jackson Park and the Midway Plaisance is manifested in the integrity of extant landscape characteristics. Explanation of the integrity and features of the cultural landscape is included in Appendix F of the HPI. The overall historic property conveys the character present during the period of significance from 1875-1968 and currently possesses historic integrity of location, design, setting, materials, workmanship, feeling, and association. The undertaking diminishes the historic property's integrity of design, materials, workmanship, and feeling.

- Primary physical changes that are concentrated in the western perimeter of Jackson Park and the eastern Midway Plaisance impact adjacent park areas including the Lagoons, Fields, and Lake Shore. The changes alter the legibility of the design of the cultural landscape in ways that diminish the overall integrity of spatial organization in the property as a whole.
- While most impacts to the cultural landscape occur in a limited spatial area, they diminish the historic property's overall integrity by altering historic, internal spatial divisions that were designed as a single entity.

- The undertaking impacts the overall historic road network, altering the historic property's designed spatial organization and the relationship between interconnected systems of pedestrian and vehicular circulation.
- The undertaking alters the shape, form, and function of the historic primary entrance to the property by changing the historic symmetrical roadway design and spatial patterns that define the connection between Jackson Park and the Midway Plaisance.
- Spatial organization and the landscape setting of some contributing resources (Cheney-Goode Memorial and Statue of the Republic) are transformed in ways that are inconsistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.
- The undertaking removes, replaces, or otherwise alters historic resources and landscape features within portions of the historic property. New materials with modern functions differ from historic materials at a scale and intent that does not conform to the Secretary of the Interior's Standards. Integrity of workmanship is obscured by changes to the integrity of park design, the addition of new features and materials, and by the removal and alteration of historic fabric that relates to material integrity.
- The size and scale of new buildings within the historic district diminish the intended prominence of the Museum of Science and Industry building and alter the overall composition and design intent of balancing park scenery with specific built areas.
- The combined changes diminish the sense of a particular period of time within the historic property and impact the integrity of feeling. The changes impact how Jackson Park and the Midway Plaisance reflect conscious decisions made by the Olmsted firm in determining the organization, forms, patterns of circulation, relationships between major features, arrangement of vegetation, and views.

3.3.2.2 Effects from Federal Actions

UPARR Partial Conversion Area within Jackson Park

If approved by NPS, the partial conversion would reduce the area subject to the provisions of UPARR within the Jackson Park Historic Landscape District around the OPC and would apply the provisions of UPARR to the eastern end of Midway Plaisance (east of the railroad embankment and viaduct) both of which are part of the historic property. The change in legal status of these areas does not in itself cause physical effects on historic properties.

City Proposed UPARR Replacement Area within the eastern Midway Plaisance

The requirement that equivalent recreation opportunities are provided within the replacement area would modify the historic character of the Midway Plaisance east of the railroad embankment and viaduct with the addition of physical features for a play area. Previously, the current layout and recreation use on this section of Midway Plaisance was articulated (see Section 1.1.1.3). The central area would reduce in size. The western side of the historic sunken lawn would be altered with the addition of a play area and walkways. The new fenced play area and placement of walks, trees, and recreational features would reduce and reconfigure the central lawn panel, deviating from the simple formality of open space that reflects the historic design principle of informal symmetry and balance in design. Addition of trees at the margins of the open space would result in a minor modification of historic spatial pattern on the eastern side of the historic sunken lawn. The addition of fences, paths, trees, and play equipment would alter the setting and feeling of the historic Cheney Goode Memorial (Exhibit 3b: 34); however, the addition of a path adjacent to the Memorial reestablishes the alignment of a missing historic route. The Memorial consists of a bench and sundial placed on the western side of the eastern Midway Plaisance in 1932. More specifically, a fenced play area directly in front of the Memorial bench would change the setting and feeling of the Memorial. The changes would not alter the location, materials, workmanship, design, and association of the Memorial itself. Therefore, the addition of fences, paths, trees, and play equipment alters historic aspects of design, setting, and feeling of the eastern end of the Midway Plaisance, resulting in a negative effect to the historic landscape.²

Improvements along Lake Shore Drive

Proposed changes to Lake Shore Drive expand road width and affect related intersections but do not alter aspects of the road that retain integrity. As part of the historic vehicular circulation network, the alignment remains and the road persists as broad, multilane drive that historically contained up to six lanes along a similar curvilinear alignment and defined the boundary between the lake shore and the interior of the park. The proposed widening and additional traffic anticipated along Lake Shore Drive will change traffic noise levels, however, changes between existing and future conditions is less than 3 dBA, which is not a perceptible change.

The widening of Lake Shore Drive requires the alteration of the contributing 59th Street Bridge (North Inlet Bridge). The alteration is consistent with the Secretary of the Interior (SOI) standards. Bridge features that convey integrity including location, design, and feeling are not altered by the project. The widening of Lake Shore Drive expands the intersections at 57th Drive, Science Drive, and Hayes Drive. The existing roadway alignments at these three locations result from several modifications to alignment between the 1980s and 2000s. Contributing features are not impacted by the adjustment of these non-contributing roadway intersections.

² <https://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/rehab/approach.htm>;
<https://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/rehab/spatial.htm>.

The addition of a lane from E. 57th Street to E. Hayes Drive also results in removal of historic parkland along the west side of the contributing roadway (Exhibit 4b: 1-2k). The widening of approximately two-feet for an additional lane generally follows the historic alignment of the road, creating only a minor change to the historic spatial organization, and does not significantly affect historic features and materials. The widening occurs within the historic view toward Lake Michigan from the adjacent Bowling Green located southwest of the Museum of Science and Industry; however, these changes do not change the character or type of features present within the viewshed and overall setting have not changed (Exhibit 4b: 1-4f). The widening increases the visual presence of the roadway from the Bowling Green by increasing the proximity of traffic; however, the degree of change is minimal. The widening also decreases the distance between the Bowling Green and the roadway, however, the change in traffic noise levels between existing and future conditions is less than 3 dBA, which is not a perceptible change.

Areas affected by change from parkland to roadway along Lake Shore Drive will be revegetated and regraded to match the existing landscape or following historic design principles for areas associated with the Great Lakes Fishery and Ecosystem Restoration (GLFER) habitat restoration project. Vegetation and paths installed under GLFER, while not historic contributing features, align to SOI standards as a rehabilitation of portions of the historic property. The narrow band of plantings associated with GLFER that are removed by lane expansion and realignment of the previously altered intersection of Lake Shore Drive and Hayes Drive are replaced along the east bank of the Jackson Park Inner Harbor (Exhibit 3a). The additional lane and removal of parkland along the road conforms to the SOI standards. The project does not “radically change, obscure, or destroy character-defining spatial organization and land patterns or features and materials.”³

Hayes Drive Reconfiguration

The reconfiguration of Hayes Drive between Stony Island Avenue and Lake Shore Drive includes sections of altered roadway that conform to the SOI standards and other sections that deviate from those standards. Overall, the widening of the roadway creates a minor change to spatial organization and does not significantly affect adjacent historic features. Changes in traffic noise levels between existing and future conditions along Hayes Drive is equal to or less than 3 dBA, which is not a perceptible change. The majority of the roadway alignment is maintained. The exceptions to the maintenance of existing alignments are at the Hayes Drive intersections with Cornell Drive and Richards Drive.

Realignment of the intersection of Hayes Drive and Cornell Drive is consistent with the SOI standards.⁴ The proposed realignment replaces a non-contributing portion of Cornell Drive with a missing historic roadway pattern that provided a curved form to adjacent parkland (Exhibit 4a: 1-2h). The reconfiguration of the intersection includes two pedestrian underpasses that entail the alteration of historic pedestrian paths and low berms directly southeast of the intersection to accommodate the changes, which are intended to improve park safety and accessibility. The realignment overlaps areas of

³<https://www.nps.gov/TPS/standards/four-treatments/landscape-guidelines/rehab/circulation.htm>
<https://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/rehab/approach.htm>

⁴ <https://www.nps.gov/TPS/standards/four-treatments/landscape-guidelines/rehab/circulation.htm>

vegetation planted under the GLFER project around the previously altered intersection. Areas affected by change from parkland to roadway along Hayes Drive will be revegetated and regraded to match the existing landscape and following historic design principles for areas associated with the GLFER project. The equivalent extent of removed plantings are replaced following GLFER precedent along the east bank of the Inner Harbor. Alterations from the realignment minimally affect the historic character of the circulation network and topography in this area. Underpasses are discussed under Bicycle/Pedestrian Enhancements below.

Realignment of the intersection of Hayes Drive with Richards Drive is not consistent with the SOI standards.”⁵ The realignment replaces the historic triangular intersection (Exhibit 4a: 1-2j) with a T-shaped intersection and changes roads and walks that define historic spatial organization and views within the setting of the *Statue of the Republic* (Exhibit 3a: 26). Rising above a circular traffic island, the statue marks the center of the triangular intersection of Hayes Drive and Richards Drive and commemorates the twenty-fifth anniversary of the 1893 World’s Columbian Exposition in 1918. The historic design is arranged to highlight the statue as the central focal point of surrounding roads and position the monument to be viewed from vehicles or at a distance from walks. The relationship between viewers and the statue is balanced by distance and speed.

The new design of the roadway bypasses the *Statue of the Republic* that is the focal point of the historic intersection. The construction of a pedestrian plaza replaces one of the last remaining historic vehicular triangular intersections within the park and the circular traffic island with a new feature (pedestrian plaza) that alters the historic circulation pattern. The contributing triangular intersection channels movement, directs views, and creates a setting for the statue. The new pedestrian zone changes the relationship between the vehicular intersection, pedestrian routes, and the statue. Although the shape of the pedestrian plaza reflects the portion of the removed roadway that formed the intersection, the intentional balance of the scale of the statue with the speed and alignment of the road is changed and the historic character of the design is altered. Realignment of the triangular intersection deviates from the design principles of informal symmetry and balance in design, unified composition, and orchestration of movement. In addition, the realignment will introduce visual elements that diminish the integrity the *Statue of the Republic*. While performing a safety function, the addition of a standard traffic signal adjacent to the statue introduces an upright, colored visual element that diminishes the integrity of the setting of the statue.

Alteration of Hayes Drive between Richards Drive and Lake Shore Drive is consistent with the SOI standards because it minimally affects contributing features and preserves historic character of the historic property. The roadway alignment and footprint remain the same at the contributing Hayes Drive Bridge and do not alter features that contribute to the integrity of the historic bridge. Adjustment of the Hayes Drive curb line and adjacent paths removes slivers of parkland planted under GLFER. Areas affected will be revegetated and regraded to match the existing landscape following GLFER precedent. The equivalent extent of removed plantings are replaced along the east bank of the Inner Harbor.

⁵ <https://www.nps.gov/TPS/standards/four-treatments/landscape-guidelines/rehab/circulation.htm>

Accommodation of a pedestrian underpass on Hayes Drive west of Lake Shore Drive creates minor changes to the predominantly level topography and presents no change to the character of views from the roadway between the *Statue of the Republic* and Lake Michigan (Exhibit 4a).

Stony Island Avenue Improvements

Changes to Stony Island Avenue do not change the overall character of the use or contributing physical features of the property. Highway noise levels along Stony Island Avenue within Jackson Park will not change more than 3 dBA, which is considered not to be a perceptible change. Widening the roadway will occupy parkland along the historic property's perimeter, realign historic sidewalks, and modify the thinly screened buffer with tree rows, groves, and subtle berms (Exhibit 4a: 1-1a); however, the character of the features will not be substantially altered. The project will realign sidewalks and regrade adjacent berms; however, the association of the road with the sidewalk and setting of perimeter topography and vegetation remains. While contributing features are altered by additions for new use, historic character is preserved in accordance with SOI standards that require "that these features are not radically changed, obscured, damaged, or destroyed."⁶ In addition, alteration of Stony Island Avenue at the intersection of the Midway Plaisance (North Roadway) includes minor widening of the road (Exhibit 4a). The change to circulation follows the historic alignment and is consistent with the SOI standards.

Other Transportation Improvements

The FHWA action also proposes changes to the character of the property's use and physical features along the east bank of the Jackson Park Inner Harbor, along Marquette Drive between Richards Drive and Stony Island, and along Cornell Drive north of Hayes Drive. The project will rehabilitate a deteriorated historic path and lagoon overlook along the Inner Harbor (Exhibit 4a: 1-2u). New plantings between the path and the shore of the Inner Harbor consist of replacement vegetation for areas associated with the GLFER project that were removed by the Federal Undertaking. Plantings in this area follow historic design principles, align with the precedent of the GLFER project, and are consistent with the SOI standards.

In these areas, the construction of pedestrian-scale walks deviates from the 1895 design and the subsequent construction of the existing, interrelated vehicular and pedestrian circulation system including broad, tree-lined roadways that help to establish historic spatial organization. Along Marquette Drive, the new walk follows the alignment of the removed portion of the historic roadway (Exhibit 4a: 1-2f). There are no perceptible (less than 3 dBA) noise level changes along these roadways as a result of the proposed improvements.

For the removed portion of Cornell Drive north of Hayes Drive, the new walk approximates the existing road alignment near the West Lagoon and connects to the walk proposed as a part of the OPC development. The walk maintains views over the West Lagoon as a pedestrian rather than vehicular experience (Exhibit 4b: 1-4a). The new walks help to minimize the impacts from removal of roads but do

⁶ <https://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/rehab/approach.htm>

not fully address the change in balance between pedestrian and vehicular circulation throughout the historic property that was part of the Olmsted principle of orchestration of movement.

Bicycle/Pedestrian Enhancements

The proposed enhancements for bicyclist and pedestrian use through underpasses and additional access do not introduce visual elements that diminish the integrity of the historic property. The construction of five shared-use underpasses (1) at the east end of Hayes Drive, (2) at the middle of Jeffery Avenue, (3) east of the intersection of Hayes Drive and Cornell Drive, (4) west of the intersection of Hayes Drive and Cornell Drive, and (5) at the southeast end of Marquette Drive, inserts a new type of circulation feature in the park for the purpose of improving park access and circulation while also enhancing public safety.⁷ Although the underpasses require minor alterations to historic topography and vegetation, their design does not radically obscure the character-defining spatial organization or land patterns of the site (cultural landscape) and is consistent with the SOI standards.⁸ The underpasses at Hayes Drive and Cornell Drive lower grades along historic walks and raise roadway grades along approximately 300 feet to accommodate the underpasses. Grades are repaired and new vegetation is installed reflecting historic patterns. New routes connect to existing walks in each location and facilitate continuity of the contributing pedestrian network across the historic property.

The addition of pedestrian refuge islands along Stony Island Avenue, Cornell Drive near the Museum of Science and Industry, and at the intersection of Hayes Drive and Richards Drive are consistent with the SOI standards associated with health and safety considerations. The addition of curb extensions along Stony Island Avenue are similarly consistent.⁹

In general, the installation of sidewalk ramps, upgrading of marked and unmarked crossings, and changes to traffic signals and timing sequences throughout the historic property are consistent with the SOI standards associated with health and safety considerations.¹⁰

3.3.2.3 Effects from Reasonably Foreseeable/Probable Actions

Roadway Closures

The closure and subsequent removal of roadways results in physical damage to the historic vehicular network in the south and west parts of the historic property. Historic road segments proposed for removal include: Midway Plaisance (South Roadway; eastbound) between Stony Island Avenue and Cornell Drive; Cornell Drive between the between 59th and 62nd Streets; the northbound portion of Cornell Drive south of Hayes Drive from 65th Street to 66th Place; and, Marquette Drive between Stony Island Avenue and Richards Drive. These roads retain historic alignments and continue to define interior

⁷ <https://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/rehab/approach.htm>

⁸ <https://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/rehab/approach.htm>

⁹ <https://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/rehab/special.htm>

¹⁰ <https://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/rehab/special.htm>

spaces, compose the historic sequence of people's movement through the landscape, and provide access to key historic locations as intended by the historic design of the site (cultural landscape).

Road closures remove historic roadways that are part of the historic property and replace them with parkland. This action alters the historic circulation network. Roadway closures affect the designed relationship between vehicular and pedestrian circulation in which modes of movement, views, and vegetation are interrelated elements. Removal of historic roadways alters spatial organization of the overall park, reduces differentiation of landscape character areas within the historic property, and is not consistent with SOI standards that recommend the retention and preservation of historic land patterns and circulation systems.¹¹

Closure of the Midway Plaisance (South Roadway; eastbound) between Stony Island Avenue and Cornell Drive removes a historic circulation route. This roadway segment demonstrates a particularly strong expression of historic landscape character related to the design of the property. The south roadway of the Midway Plaisance forms part of the formal and balanced juncture between the eastern parts of the original South Park (Jackson Park, the Midway Plaisance, and Washington Park). Closure of the roadway section removes an aspect of spatial organization that is fundamental to the historic design of Jackson Park at its connection to the Midway Plaisance. This closure removes contributing historic circulation and spatial organization at the primary public interface with both Jackson Park and the Midway Plaisance. The action would eliminate the purposeful connection between and symmetrical composition of this distinct portion of the historic property.

Closure of Marquette Drive between Stony Island Avenue and Richards Drive also converts a contributing roadway into parkland. In addition, the removal of Marquette Drive eliminates the historic, contributing triangular intersection with Richards Drive (Exhibit 4a: 1-2g). This is one of the last remaining historic vehicular triangular intersections within the park. The intersection and Marquette Drive approximately between S. Cregier Avenue and Lake Shore Drive demonstrate particularly strong expressions of historic landscape character related to the design of the property. The road closures alter contributing spatial organization and circulation routes.

Closure of Cornell Drive north of Hayes Drive between 59th and 62nd Streets and the northbound portion of Cornell Drive south of Hayes Drive between 65th Street and 66th Place removes a road segment that contributes to the historic circulation network of the property.

Closure of Cornell Drive between 62nd and 65th Streets and between 66th Place and 67th Street will not alter the integrity of the historic property (district) because substantial modification of these roadway segments occurred previously, and these sections of road do not contribute to the significance of the cultural landscape.

¹¹ <https://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/rehab/circulation.htm>

OPC Site Development

Implementation of the OPC proposed design will affect the overall site (cultural landscape), the Perennial Garden/Women's Garden, the English Comfort Station, and the Western Perimeter Playground (E. 62nd Street playground) (Exhibit 4b).

The OPC will transform the cultural landscape within the project footprint. The project site overlays part of the western park perimeter of the historic property. The proposed design replaces contributing landscape characteristics, which include spatial organization, topography, vegetation, and circulation, with new features. While location of proposed partially underground buildings and development of green roofs on three of the buildings reduces the visibility of new buildings within the landscape and provides the appearance of green space within the footprint of the project, its implementation will change the character of the historic landscape. In particular, the historic design principles of the prominence of landscape scenery, unified composition, and orchestration of use will be changed within the historic open space of the project footprint by the addition of the Museum Building and other buildings. This is not consistent with the SOI standards that state: "When alterations to a cultural landscape are needed to assure its continued use, it is most important that such alterations do not radically change, obscure, or destroy character-defining spatial organization and land patterns or features and materials."¹²

Changes to the cultural landscape directly north of the proposed OPC buildings but within the project footprint remove physical features that contribute to the significance of the historic property. A new garden will replace the historic Perennial Garden/Women's Garden, built in 1936 (Exhibit 4b: 1-10). The garden lies within the center of the formal terminus of the Midway Plaisance in Jackson Park and was historically developed to be symmetrically framed by the main park drives and adjacent walks of the Midway Plaisance north and south roadways, Stony Island Avenue, and Cornell Drive. The changes to the garden will make the space universally accessible, by removing steps currently surrounding the garden, and introducing new accessible paths around the perimeter and down to the sunken garden. The new design incorporates several characteristics of the historic garden, including the interior dimensions, general shape and location, surrounding plant beds, and plant types. The new garden demonstrates aspects of the original design principles of juxtaposition of design formality, informal symmetry and balance, and sustainable design and environmental conservation; however, extant historic materials are removed and the organization of the space is altered to implement the proposed design. The symmetrical layout of concentric rings of planting beds and paths will be replaced with a series of asymmetrical winding paths, gathering spaces, stormwater catchment areas, and plant beds. Historic materials including stone edged terraced planting beds, steps, and vegetation, will be removed. The symmetrical triangular path intersections at the east side of the space that define the transition from the Midway Plaisance to Jackson Park will be replaced with asymmetrical paths (Exhibit 4a: 1-2m). Removal of the relatively uniform topographic setting surrounding the sunken garden and replacement with undulating hills and swales does not correspond to the formality of the historic design in relation to

¹² <https://www.nps.gov/TPS/standards/four-treatments/landscape-guidelines/rehab/approach.htm>

its setting. Implementation of the new garden physically damages this part of the site (cultural landscape) that contributes to the historic property.

With the exception of the English Comfort Station building (Exhibit 3b-16), the remainder of the contributing historic features south of the Perennial Garden/Women's Garden to 62nd Street will be removed or altered to accommodate the elements associated with the OPC. The western perimeter exhibits integrity to the period of significance and demonstrates continuity in the larger patterns of spatial organization, land use, views, circulation, and tree massing. The area designed and designated by Olmsted as an outdoor place for exercise (he used the term "gymnasia") retains the designed composition and general form of two open fields surrounded by canopy trees that are joined in the middle by the historic layout of the Western Perimeter Playground and English Comfort Station (Exhibit 4b: 1-7). Olmsted's use of "men's gymnasium" and "women's gymnasium" for the north and south fields refers to the original meaning of the word as a general place of exercise, rather than as a room or building for enclosed sports activities. The change to this portion of the historic property is not consistent with SOI standards that stipulate the need to preserve contributing historic features and discourage "placing a new feature where it may cause damage to, or be intrusive in spatial organization and land patterns." The standards cite an example of inserting a new visitor center that blocks or alters a historic view or vista."¹³ The addition of buildings, service facilities, paths, and landscaping changes contributing spatial organization, topography, vegetation, and circulation in the location of the contributing playground and the historic fields of the western perimeter.

Addition of a two-level athletic center (the PAAC) as well as paved pedestrian paths and play areas involves reconfiguration of historic paths, spaces, and play areas, and the replacement of vegetation. This alters historic design, setting, and feeling of the contributing spatial organization, walkways, and canopy trees of the Western Perimeter Playground. The contributing playground site provided a symmetrical landscape setting around the historic English Comfort Station and a designed fulcrum to the balanced layout of the historic fields to the north and south (Exhibit 4b: 1-2p). The current playground does not contain historic play equipment. Replacement of the character-defining, U-shaped walk with asymmetrical pathways around an athletic center (the PAAC) and series of new, dispersed playground areas departs from the original application of historic design principles with respect to the setting of the historic resource and its relationship to the cultural landscape; however, elements of the new playground design may internally demonstrate informal symmetry and balance in design, and a unified composition. Although the new playground and picnic areas will be approximately five times larger than the historic play areas, the development of the PAAC and associated grounds result in removal of distinctive uses, features, spaces, and spatial relationships that characterize this portion of the historic property, and therefore is inconsistent with the SOI standards which emphasize the retention of historic character, distinctive features, and characteristic spatial relationships.

¹³ <https://www.nps.gov/TPS/standards/four-treatments/landscape-guidelines/rehab/spatial.htm>

Historic views are part of the site (cultural landscape) that contributes to the historic property. Construction of the OPC includes the addition of new visual elements that diminish the integrity of views along the western park perimeter within the historic property. Tall buildings exist outside of the historic property but not within it. Within the historic property, the comparatively low-lying Museum of Science and Industry building was intended as the only building to be a “dominating object of interest” inside of Jackson Park and the Midway Plaisance.¹⁴ The proposed OPC Museum Building affects views within the historic property by drawing specific focus to an exceptionally prominent building. This building will disrupt historic, designed views over parkland from the East Lagoon (Music Court) Bridge (Exhibit 4b: 1-4b), the Wooded Island North Bridge (Exhibit 4b: 1-4c), and the west side of the Wooded Island (Exhibit 4b: 1-4d). Westward and southward views from these locations reveal a designed setting with features of the waterways, a backdrop of tree canopy, and tall buildings and residential development that recede into the background outside of the boundary of the historic property. Despite the design and siting of OPC site elements and buildings to blend into the landscape setting, the proposed project diverges from the design principles of the prominence of landscape scenery and a unified composition by proposing building mass and landforms within the park at the edge of the lagoons that draw specific focus on the proposed buildings including the façade of the proposed Museum Building.

The OPC construction alters historically important topography that defines spaces, forms a unifying element along the western perimeter, and provides a sense of physical and visual separation between uses. Within the OPC footprint, the historic berms between E. 60th Street and E. 62nd Street and west of S. Cornell Drive are removed in some locations to provide level access and accentuated in height in other areas (Exhibit 4b: 1-1a, 1-1b). The proposed design provides topography that functions as a physical and visual buffer between the park and the neighborhood setting; however, the design adds buildings and landscape features that detract from and alter extant historic topography.

Construction of the OPC also changes existing historic vegetation in a way that is inconsistent with SOI standards which emphasize the retention, preservation, protection, and maintenance of historic materials and features. The historic planting design and extant patterns of historic vegetation were designed to create interest in the landscape, provide buffers, define spaces, reinforce circulation routes and views, and create a sense of removal from the surrounding city. While new plantings associated with the OPC were designed to fulfill these functions for the new facilities of the OPC, the design results in partial removal of Olmsted designed historic vegetation patterns including groves of canopy trees around the historic playing fields and regular rows of trees along the streetscape (Exhibit 4b: 1-5, 1-7). Placement of a small water lift station near the OPC site includes the placement of utility covers and a modified embankment in an area of GLFER plantings along the west bank of the West Lagoon. The project does not affect the waterbody and the affected area will be revegetated and regraded to match the existing landscape. The equivalent extent of plantings replaced by the utility covers are installed following GLFER precedent along the east bank of the Inner Harbor (Exhibit 4a: 1-2u).

¹⁴ Correspondence from Olmsted to Donnersberger May 7, 1894. Washington DC, Library of Congress, Olmsted Papers) Series A34:79.

Track and Field Relocation

This action relocates the track and field to an area with ball fields that were added in the 1940s within one of the two open fields (or “gymnasia”) designed for outdoor recreation along the western perimeter (Exhibit 4a: 1-7). The action raises a portion of the recessed topography to accommodate the track and field and realigns a historic path along Cornell Drive; however, it relocates existing features from a similar location that continues to demonstrate historic integrity. The proposed changes to contributing topography and walks on the west edge of the proposed track and field continue to demonstrate character-defining patterns.¹⁵ The introduction of similar features will not further diminish the integrity of the historic property in the proposed location. The relocation is consistent with SOI standards because it retains overall patterns and preserves the southern field as an open recreational space.¹⁶

¹⁵ <https://www.nps.gov/TPS/standards/four-treatments/landscape-guidelines/rehab/approach.htm>

¹⁶ <https://www.nps.gov/TPS/standards/four-treatments/landscape-guidelines/rehab/spatial.htm>

3.4 Other Historic Properties

Photographs to and from Jackson Park for each of the remaining historic properties identified in the HPI with potential effects from the Federal actions are provided in Photos 10 through 24 in Appendix C. Renderings for viewshed analyses of the OPC Museum Building are provided in Photos 30 through 36.

3.4.1 Stony Island State Trust & Savings Bank (Stony Island Arts Bank)

3.4.1.1 *Description of property*

The Stony Island State Trust & Savings Bank, known today as the Stony Island Arts Bank, sits on the west side of S. Stony Island Avenue, between E. 67th Place and E. 68th Street at 6760 S. Stony Island Avenue. See Exhibit 2. In December 2013, the Stony Island Trust & Savings Bank was individually listed in the NRHP under Criteria A and C. During the property's Period of Significance of 1923 to 1931, the fine Classical Revival style bank served as a center of the South Shore community's economic life and symbol of the neighborhood prosperity of that era.

The Stony Island State Trust & Savings Bank retains a very high level of integrity of location, design, workmanship, and materials in relation to its architectural significance. After sitting vacant for over three decades, the building was restored and redeveloped by non-profit arts organization for use as a community center and art gallery in 2013. Because the project retained a substantial original fabric, and many interior spaces continue to express its original bank/office functions, the property also retains a high degree of integrity of feeling and association. However, the property retains a low degree of integrity of setting.

During its Period of Significance, the monumental Classical Revival style bank stood within a vibrant commercial district. Between the 1970s and the early 21st century, many of the surrounding small historic commercial buildings were razed. Some of the area's numerous open spaces have been redeveloped as small commercial strip malls with surface parking lots in front of the businesses. The property's integrity of setting has also been affected by several roadway projects including the widening of S. Stony Island Avenue (ca. 1940s, late 1960s, early 1980s) and construction of the S. Cornell Drive spur (ca. 1975) since the property's Period of Significance.

3.4.1.2 *Effect Determination*

The undertaking will not alter the Stony Island Trust & Savings Bank's integrity of location, design, workmanship, materials, feeling and association. The property's integrity of setting is quite low. Since 1931, the end of the Period of Significance for this property as determined by its NRHP form, the Stony Island Trust & Savings Bank's setting has undergone substantial changes. These include the demolition of adjacent properties, previous roadway widenings along Stony Island Avenue, construction of the south end of the Cornell Drive spur, and the presence of numerous vacant lots and commercial strip developments. The OPC Museum Building may be visually perceptible from some vantage points, however, it will only be seen in distant views, and there are other high-rises in closer proximity to the

property. The undertaking will not further diminish the property's already extremely low integrity of setting. Therefore, the undertaking will have ***no adverse effect*** to the Stony Island Trust & Savings Bank.

3.4.1.3 Assessment of Effects on the Stony Island Trust & Savings Bank (Stony Island Arts Bank)

3.4.1.3.1 Effects from Federal Actions

The Stony Island Trust & Savings Bank is a considerable distance away from the NPS UPARR conversion area (approximately 4,000 feet (0.75 miles)). However, the property is closer in proximity with some of the associated roadway closures, considered for UPARR replacement land. It is located 600 feet from the southernmost limit of the northbound lanes of S. Cornell Drive north of E. 67th Street (within Jackson Park), which is considered part of the UPARR replacement land. Neither the UPARR conversion nor replacement areas will cause any physical changes to the property or the features that contribute to its historic significance.

The Stony Island Trust & Savings Bank is located along the southern limit of the roadway improvements that are part of the FHWA action along S. Stony Island Avenue at E. 68th Street. The roadway improvements include reconfiguration of the south approach to the S. Stony Island Avenue intersection with E. 67th Street as a result of the removal of the northbound lanes of S. Cornell Avenue from E. 68th Street to the north. Roadway widening along S. Stony Island Avenue is proposed north of the E. 67th Street intersection. Sidewalk improvements are also proposed along S. Stony Island Avenue; however, these improvements do not occur adjacent to the Stony Island Trust & Savings Bank. There will be no physical changes to the Stony Island Trust & Savings Bank associated with the roadway improvement work. This action will not cause an effect on the features of the property's setting that contribute to its significance. A noise analysis determined that no perceptible audible differences (less than a 3 dBA change in noise level) to the Stony Island Trust & Savings Bank will be associated with the roadway improvements.

The Federal actions will not cause any changes in the use of the Stony Island Trust & Savings Bank.

3.4.1.3.2 Effects from Reasonably Foreseeable/Probable Actions

The development of the OPC and proposed permanent roadway closures will not cause any physical changes to the Stony Island Trust & Savings Bank. There may be some visual effects associated with these projects. As shown in Photo 30 in Appendix C, the construction of the OPC Museum Building may be visually perceptible from the Stony Island Arts Bank. Although this addition may introduce a visual change within the park from the Stony Island Arts Bank, the construction of the high-rise Good Shepard Manor Senior Center apartments at 6720 S. Cornell Avenue in the late 1980s has previously altered this view.

In addition, there may be some potential visual changes to the Stony Island Trust & Savings Bank's setting because it is located along a portion of the proposed roadway removal of northbound S. Cornell Drive from E. 68th Street to the north. However, this roadway configuration was constructed in the late

1970s after the property's Period of Significance, therefore, these changes will have no effect on the property or the features of its setting that contribute to its significance.

The relocation of the Jackson Park track and field is located 3,400 feet (0.6 miles) from the Stony Island Trust & Savings Bank. It will not cause any physical changes to the property, nor will it be visible from the property.

3.4.2 William Dexter Three-Flat

3.4.2.1 Description of property

The William Dexter Three-Flat is located at 1549 E. 65th Place, about a half-block west of S. Stony Island Avenue and the southwestern side of Jackson Park. See Exhibit 2. It was determined to be individually eligible under Criteria A and C for listing in the NRHP on July 10, 2018 per the historic resource survey forms prepared for this project. William Dexter, a successful butter manufacturer, commissioned architect N. Max Dunning to design this fine, spacious Craftsman style three-flat in 1912. With close proximity to nearby Jackson Park and the lakefront as well as public transportation and other amenities along S. Stony Island, Dexter erected his low-rise apartment building in the fashionable Woodlawn neighborhood.

The William Dexter Three-Flat retains a high level of integrity of location, design, workmanship, materials, feeling and association in relation to its architectural significance. However, its integrity of setting has been considerably diminished. Since 1978, the end of the Period of Significance for this property, many nearby early 20th century structures on the 1500 block of E. 65th Place were razed. This includes the demolition of low-rise apartments that were directly east of the property. Today, there is a large vacant lot that stretches from the east lot line of the William Dexter Three-Flat to S. Stony Island Avenue. There are also numerous contiguous vacant lots on both sides of E. 65th Street, towards the west end of the block. Because of these substantial changes, the William Dexter Three-Flat's integrity of setting is low.

3.4.2.2 Effect Determination

The undertaking will not alter the William Dexter Three-Flat's integrity of location, design, workmanship, materials, feeling and association. The property's integrity of setting is quite low. Since 1978, the end of the Period of Significance for this property, the property's setting has undergone substantial changes primarily due to the demolition of adjacent historic properties and existence of vacant lots in their places. Therefore, the property's integrity of setting has previously been compromised. As described in the above assessment, the potential for effects to the William Dexter Three-Flat to the property's setting and integrity arises from the implementation of the OPC and adjacent roadway work. However, the OPC Museum Building will have little to no visual impact on the property and the roadway changes will not affect the property's low integrity of setting. The undertaking will have no impact on the property's significant historic features and, therefore, the undertaking will have **no adverse effect** to the William Dexter Three-Flat.

3.4.2.3 *Assessment of Effects on property*

3.4.2.3.1 Effects from Federal Actions

The William Dexter Three-Flat is a considerable distance away from the NPS UPARR conversion area (approximately 2,500 feet (0.47 miles)). However, it is closer in proximity with some of the associated roadway closures, considered for UPARR replacement land. It is located 300 feet from the westernmost limit of the E. Marquette Drive roadway closure. Neither the UPARR conversion nor replacement areas will cause any physical changes that will cause effects to the property or the features than contribute to its historic significance.

The William Dexter Three-Flat is located just west of an expansive a vacant lot at E. 65th Street and S. Stony Island Avenue. The vacancy of the lot allows for visual access to the intersection and roadway. In this area, the FHWA action includes roadway widening and intersection improvements at S. Stony Island Avenue and E. 65th Place. Roadway improvements include two-way traffic along S. Cornell Drive at the intersection, replacement of the existing landscaped median, and additional pavement width. Sidewalk improvements are also proposed along the east and west sides of S. Stony Island Avenue. There will be no physical changes to the William Dexter Three-Flat associated with this work. The roadway improvements will not cause any alterations to the features of the property's setting that contribute to its significance, as many nearby buildings have been demolished or newly constructed since the property's Period of Significance and Stony Island Avenue has been historically widened over time. A noise analysis determined that no perceptible audible differences (less than a 3 dBA change in noise level) to the William Dexter Three-Flat will be associated with the roadway improvements.

The Federal actions will not cause any changes in the use of the William Dexter Three-Flat.

3.4.2.3.2 Effects from Reasonably Foreseeable/Probable Actions

The development of the OPC will not cause any physical changes to the William Dexter Three-Flat. In addition, it is unlikely that there will be visual effects associated with the project. As shown in Photo 31 in Appendix C, the construction of the OPC Museum Building will not be visible at street-level, and may not be visually perceptible at all. Even if there is some visibility from upper stories of the property, this addition will not impact any historic features that relate to the significance of the William Dexter Three-Flat.

In addition, the proposed roadway closures of E. Marquette Drive and northbound Cornell Drive will not cause any physical changes the William Dexter Three Flat. The roadways currently are not highly visible from the property given their locations are one block south and 500 feet east of the property and views of these roadways are shielded by bordering vegetation along the west side of Jackson Park. Therefore, the roadway closures of E. Marquette Drive and northbound Cornell Drive will not cause any effects to the property or its setting.

The relocation of the Jackson Park track and field is located 1,800 feet (0.3 miles) from the William Dexter Three-Flat. It will not cause any physical changes to the property, nor will it be visible from the property.

3.4.3 Island Terrace Apartment Building

3.4.3.1 Description of property

The Island Terrace Apartment Building is located on the west side of S. Stony Island Avenue between E. 64th and E. 65th Streets at 6430 S. Stony Island Avenue. See Exhibit 2. The Island Terrace Apartment Building was determined to be individually eligible for listing in the NRHP under Criteria A and C on July 10, 2018 per the historic resource survey forms prepared for this project. Produced by the noteworthy architectural firm of Dubin, Dubin, Black, & Moutoussamy, the structure was one of the neighborhood's first Modern high-rises designed to provide affordable apartments to moderate and low-income renters. The structure was built in 1969, and its urban setting of Woodlawn along S. Stony Island Avenue and close physical and visual proximity to Jackson Park have always contributed to its significance.

The Island Terrace Apartment Building has had only minimal alterations since its completion in 1969 and thus retains a high level of integrity of location, design, workmanship, materials, feeling and association in relation to its architectural significance. The property also possesses integrity of feeling and association as a Modern building with high-quality, affordable apartments with close visual and physical access to Jackson Park and its expansive landscape.

The Island Terrace Apartment Building's integrity of setting, however, is low. Since the late 1960s, approximately a dozen structures north, south, northwest, and southwest of the Island Terrace Apartment Building have been demolished. By the mid-1990s, Walter Scott School, just northwest of the property, had also been razed and adjacent S. Harper Avenue was greened over. Mount Carmel High School built Haggerty Athletic Field on that site.

The Island Terrace Apartment Building is bordered on the east by S. Stony Island Avenue and the green space of Jackson Park's western perimeter (labelled as LCA 1.1. in Figure 8 of the HPI), including the Jackson Park Field House to the northeast (built about a decade prior to the high-rise). To the southeast, the widening of S. Stony Island Avenue and construction of the S. Cornell Drive southbound spur to S. 65th Place were undertaken shortly after the Island Terrace Apartment Building was erected. The southern part of the Western Perimeter of Jackson Park has had few changes since the late 1960s when the Island Terrace Apartment Building was erected. However, due to the many other changes to the area, the property's integrity of setting has been considerably diminished.

3.4.3.2 Effect Determination

The undertaking will not alter the Island Terrace Apartment Building's integrity of location, design, workmanship, materials, feeling and association. Since 1978, the end of the Period of Significance for this property, the Island Terrace apartment's setting has undergone substantial changes. However, despite the property's low integrity of setting, the Island Terrace Apartment Building has continuously maintained its physical and visual relationship with Jackson Park. There may be some physical changes

to the property's setting including sidewalk improvements, widening of S. Stony Island Avenue, the realignment of S. Hayes Drive and S. Cornell Drive south of Hayes Drive, and new elements within its viewshed within Jackson Park. However, the visual and physical relationship between the Island Terrace Apartments and Jackson Park will be maintained and none of these changes will cause effects to features that contribute to the significance of the Island Terrace Apartment Building or its setting. Therefore, the undertaking will have ***no adverse effect*** to the Island Terrace Apartment Building.

3.4.3.3 *Assessment of Effects on property*

3.4.3.3.1 Effects from Federal Actions

The Island Terrace Apartment Building is located approximately 1,800 feet (0.3 miles) from the NPS UPARR conversion area and approximately 300 feet west of the northbound S. Cornell Drive roadway closure considered for UPARR replacement. Despite the close proximity to the action, neither the UPARR conversion nor replacement areas will cause any physical changes that will cause effects to the property or the features of its setting that contribute to its historic significance. The UPARR conversion area does not introduce any visual changes to the property or its setting. The UPARR replacement area along S. Cornell Drive may introduce some changes that could be visible from some units on the upper stories of the high-rise. However, the Island Terrace Apartment Building will continue to front onto S. Stony Island Avenue and will maintain its close physical and visual relationship with Jackson Park. Therefore, these visual changes would not alter the features of the property's setting that contribute to its historic significance.

The Island Terrace Apartment Building is located along the west side of S. Stony Island Avenue where proposed roadway improvements from the FHWA action will occur. Roadway improvements include widening of S. Stony Island Avenue and improving intersections at E. 65th Street and E. 64th Street. Sidewalk improvements are proposed along the west side of S. Stony Island Avenue in front of the Island Terrace Apartment Building. This will include removing the existing narrow strip of parkway directly in front of the building. However, the property will continue to maintain its close physical and visual relationship with Jackson Park, and therefore, this minor alteration will not cause an effect on the features of the property's setting that contribute to its significance. In addition, there will be no perceptible audible changes (less than a 3 dBA change in noise level) associated with the proposed improvements.

No changes will occur to the Island Terrace Apartment Building's use.

3.4.3.3.2 Effects from Reasonably Foreseeable/Probable Actions

The development of the OPC site, roadway closures, and relocated track and field may result in some new visual elements that could be perceptible within views from some units of the Island Terrace Apartment building. As shown in Photos 32-33 in Appendix C, the construction of the OPC Museum Building may be visible at street-level. The relocated track and field and proposed roadway closures within the park may also be visible from some units on the upper-levels of the building. However, the building will remain a Modern high-rise that fronts onto S. Stony Island Avenue and maintains close

physical and visual relationships with Jackson Park and its expansive landscapes. Therefore, these changes will have no effect on the features of the property's setting that contributes to its significance.

3.4.4 Hyde Park High School

3.4.4.1 Description of property

Hyde Park High School (known today as Hyde Park Academy High School) is located on the west side of S. Stony Island Avenue between E. 62nd and 63rd Streets at 6220 S. Stony Island Avenue. See Exhibit 2. Hyde Park High School was determined to be individually eligible for listing in the NRHP under Criteria A, B, and C on July 10, 2018 per the historic resource survey forms prepared for this project. Since its completion in 1913, the Beaux Arts style building housed a prominent public high school. The close physical and visual proximity to Jackson Park have always contributed to the property's significance.

Hyde Park High School retains excellent integrity of location, design, workmanship, and materials in relation to its architectural significance. Additions to the building were undertaken prior to the end of the 1978 Period of Significance, and were designed with compatible materials and design. The structure possesses integrity of feeling, and association as a prominent public school that took full advantage of its proximity to and verdant views of Jackson Park. The property's integrity of setting has been somewhat diminished, however. Between the 1960s and 1980s, several properties south of Hyde Park High School were razed. These included low-rise apartment buildings; the Parkland Hotel at S. Stony Island and S. Harper Avenue; and a previous elevated railroad track and platform along E. 63d Street. The Chicago Public Schools had installed a narrow rectangular surface parking lot south of the south additions, and this was enlarged over the years.

Although Jackson Park's Western Perimeter of Jackson Park has had some changes over time (labelled as LCA 1.1 in Figure 8 of the HPI), lawn and trees have always been the predominant feature in views east from Hyde Park High School.

3.4.4.2 Effect Determination

The undertaking will not alter the Hyde Park High School's integrity of location, design, workmanship, materials, feeling and association. The property's integrity of setting has been somewhat diminished. Since 1978, the end of the Period of Significance for this property, the Hyde Park High School's setting has undergone substantial changes. However, despite this, Hyde Park High School's setting has continuously maintained its physical and visual relationship with Jackson Park. There may be some physical changes to the property's setting including sidewalk improvements, widening of S. Stony Island Avenue, a realignment of S. Hayes Drive and S. Cornell Drive south of Hayes Drive in Jackson Park, and new elements that may be perceptible within views from the Hyde Park High School. However, the visual and physical relationship between Hyde Park High School and Jackson Park will be maintained and none of these changes will cause effects to features that contribute to the significance of the Hyde Park High School or its setting. Therefore, the undertaking will have **no adverse effect** to the Hyde Park High School.

3.4.4.3 *Assessment of Effects on property*

3.4.4.3.1 Effects from Federal Actions

Hyde Park High School is located approximately 750 feet (0.14 miles) south of the UPARR conversion area. It is also approximately 575 feet (0.10 miles) west of S. Cornell Drive, which is proposed as replacement UPARR land. Despite the close proximity to the action, neither the UPARR conversion nor replacement areas will cause any physical changes to the property or result in effects to features of its setting that contribute to its historic significance. The UPARR conversion area does not introduce any visual changes to the property or its setting. The UPARR replacement area along S. Cornell Drive may introduce some changes that could be visible from Hyde Park High School. However, Hyde Park High School will continue to maintain its close physical and visual relationship with Jackson Park, and therefore, these visual changes would not affect the features of the property's setting that contribute to its historic significance.

Hyde Park High School is located along S. Stony Island Avenue north of its intersection with E. 63rd Street. The FHWA Action may include roadway improvements in this area such as widening of S. Stony Island Avenue and improvements at the E. 63rd Street and E. 62nd Street intersections. Sidewalk improvements are proposed along the west side of S. Stony Island Avenue in front of the Hyde Park High School. None of these improvements will cause an effect on the features of the property's setting that contribute to its significance, as the property will continue to maintain its close physical and visual relationship with Jackson Park and Stony Island Avenue has been historically widened over time. In addition, there will be no perceptible audible changes (less than a 3 dBA change in noise level) associated with the proposed improvements.

The Federal Actions will not cause any changes to the Hyde Park High School's use.

3.4.4.3.2 Effects from Reasonably Foreseeable/Probable Actions

The development of the OPC site, roadway closures, and relocated track and field may result in some new visual elements that could be perceptible within some views of Hyde Park High School. As shown in Photo 34 in Appendix C, the construction of the OPC Museum Building may be visible at street-level. In addition, the Jackson Park track and field relocation is proposed to occur across the street from the property. As explained in the project's HPI, historically there were two oval tracks located at Jackson Park's Western Perimeter and the south track (site of proposed relocated track) remained in the park longer than the track to the north. Even with these possible changes, Hyde Park High School will remain a fine Beaux Arts style school building that fronts onto S. Stony Island Avenue and maintains close physical and visual relationships with Jackson Park and its expansive landscapes.

3.4.5 **Jackson Park Terrace Historic District**

3.4.5.1 *Description of property*

The Jackson Park Terrace Historic District is located on the west side of S. Stony Island Avenue at 6018-6050 S. Stony Island Avenue / 6040-6050 S. Harper Avenue. Composed of 24 low-rise apartment

structures and a 19-story high-rise, the complex is generally bounded by E. 61st Street, S. Blackstone Avenue, E. Public Way (S. Park Shore East), and S. Stony Island Avenue. See Exhibit 2. The Jackson Park Terrace was determined to be eligible under Criteria A and C for listing as a historic district in the NRHP on July 10, 2018 per the historic resource survey forms prepared for this project. Developed by the Woodlawn Organization (TWO) to provide affordable housing and services in Woodlawn in the early 1970s, the complex was designed by renowned African-American planners and architects, Whitely-Whitley. As is clear from the name of the complex, its close visual and physical proximity to Jackson Park (and nearby Midway Plaisance) have always been considered one of the property's most important assets.

The Jackson Park Terrace Historic District retains a high degree of integrity of location, design, workmanship, and materials in relation to its architectural significance. It also retains a high level of integrity of feeling, and association as an affordable housing complex designed to take full advantage of its close proximity to Jackson Park and the Midway Plaisance. The Jackson Park Terrace's integrity of setting, however, has been somewhat diminished.

When the complex was built in the early 1970s, the area between its northernmost east-west street (one of two internal roadways called E. Public Way) and E. 60th Street was composed of lawn with the eight-story historic Plaisance Hotel at the corner of S. Stony Island Avenue and E. 60th Street. The hotel was demolished in the early 1980s, and a large rectangular surface parking lot was installed between the northern roadway (E. Public Way) and E. 60th Street around 2000. In addition, the Experiment Station/61st Street Farmer's Market (at E. 61st and S. Dorchester) installed an organic garden growing facility at the east end of the northern roadway in 2013. The area south of the Jackson Park Terrace complex, between E. 61st and E. 62nd Streets, was historically filled with low-rise apartments. These were replaced by the Park Shore East Co-op in 1980. Views east towards the Western Perimeter of Jackson Park (labelled as LCA 1.1 in Figure 8 of the HPI) have remained generally consistent over the years. Some park features have changed or were installed in the area across from the Jackson Park Terrace since its construction in 1974, including the 8-lane rubberized-surface track installed in 2000. Despite such changes, lawn and trees have always been the predominant features of east views.

3.4.5.2 *Effect Determination*

The undertaking will not alter the Jackson Park Terrace Historic District's integrity location, design, workmanship, materials, feeling and association. The property's integrity of setting has been previously compromised. Since 1978, the end of the Period of Significance for this property, the areas north and south of the Jackson Park Terrace's setting have undergone substantial changes. To the east, some park features have changed since that time; however, the historic district has continuously maintained its physical and visual relationship with Jackson Park and the Midway Plaisance. There may be some physical changes to the property's setting that may be perceptible within views from the Jackson Park Terrace, however, the visual and physical relationship between the property and Jackson Park and the Midway Plaisance will be maintained and none of these changes will cause effects to features that

contribute to the significance of the Jackson Park Terrace or its setting. Therefore, the undertaking will have **no adverse effect** to the Jackson Park Terrace Historic District.

3.4.5.3 *Assessment of Effects on property*

3.4.5.3.1 Effects from Federal Actions

The Jackson Park Terrace Historic District is located approximately 100 feet west of the UPARR conversion site, across S. Stony Island Avenue from Jackson Park. It is also located 350 feet (approximately 0.07 miles) south of the Midway Plaisance, a portion of which is proposed by the City of Chicago for UPARR replacement land. Despite the close proximity to the action, neither the UPARR conversion nor replacement areas will cause any physical changes to the property or result in effects to features of its setting that contribute to its historic significance as the property will continue to maintain its relationship with Jackson Park and the Midway Plaisance.

The Jackson Park Terrace Historic District is located along S. Stony Island Avenue where the FHWA Action proposes roadway widening and intersection modifications at E. 60th Street and S. Midway Plaisance. Sidewalk improvements are also proposed along the west side of Stony Island Avenue in front of the property. There will be no physical changes to the Jackson Park Terrace associated with this work. Some of the physical changes to the property's setting (widening of S. Stony Island Avenue and traffic intersection modifications), may be perceptible within some views from the district. However, these changes will not cause any effect on the property's features that contribute to its significance as the property will continue to maintain its relationship with Jackson Park and the Midway Plaisance. In addition, there will be no perceptible audible changes (less than a 3 dBA change in noise level) associated with the proposed improvements.

The Federal Actions will not cause any changes to the Jackson Park Terrace's use.

3.4.5.3.2 Effects from Reasonably Foreseeable/Probable Actions

The development of the OPC site, roadway closures, and relocated track and field may result in some new visual elements that could be perceptible within some views of units of the Jackson Park Terrace. As shown in Photo 35 in Appendix C, the construction of the OPC Museum Building will likely be visible from some vantage points within the complex. The removal of the 8-lane rubberized-surface track will have no impact on the property's integrity of setting because the track is not a historic feature and was constructed after the property's Period of Significance. Despite the introduction of some new visual elements, including views of the OPC Museum Building, Jackson Park Terrace will maintain its close physical and visual relationships with Jackson Park, the Midway Plaisance, and their expansive landscapes.

3.4.6 **Hyde Park-Kenwood Historic District**

3.4.6.1 *Description of property*

The Hyde Park-Kenwood Historic District is bounded roughly by E. 59th Street on the north; E. 47th Street on the south; S. Lake Park Avenue from E. 47th Street to E. 56th Street and S. Stony Island Avenue from E. 56th Street to E. 59th Street on the east; and S. Cottage Grove Avenue on the west. See Exhibit 2. In

February 1979, the Hyde Park-Kenwood Historic District was officially listed on the NRHP under Criteria A, B, and C. Periods of Significance were not clearly specified in nomination forms of the 1970s; however, a Period of Significance of 1860-1937 can be inferred from the nomination form. Research and analysis was conducted for the HPI produced for this project to evaluate properties erected between 1937 and 1978. The project determined that numerous properties erected between 1937 and 1978 within the historic district could be deemed as contributing resources. Both the 1979 nomination and this project determined that the Hyde Park-Kenwood Historic District possesses an enormous collection of historic properties that have important associations with Jackson Park, the Midway Plaisance, and the University of Chicago.

The Hyde Park-Kenwood Historic District retains a high level of integrity of location, design, workmanship, and materials in relation to the architectural significance of its vast collection of buildings. The historic district also retains a high level of integrity of association, feeling, and setting as an exceptional residential and academic enclave with close physical and visual proximity to Jackson Park and the Midway Plaisance. The historic district is bisected by the ICRR Viaduct and Embankments. As shown in the HPI Figure 9, most of the Hyde Park-Kenwood Historic District lies outside of the APE boundaries. This project determined that most of structures built after 1978 have associations with the University of Chicago. Although the structures represent a broad range of architectural styles, designs, and materials, most of them are similar in scale and height to other nearby structures within the historic district. In addition, many have setbacks, courtyards, or other landscaped spaces that provide unity between these contemporary buildings, the historic properties, Jackson Park and the Midway Plaisance. Therefore, the addition of contemporary structures has not diminished the historic district's integrity of setting.

3.4.6.2 *Effect Determination*

The undertaking will not alter the Hyde Park-Kenwood Historic District integrity of location, design, workmanship, materials, feeling and association. There may be some physical changes to the property's setting (sidewalk improvements; widening of S. Stony Island Avenue; realignment of S. Hayes Drive and S. Cornell Drive south of Hayes Drive in Jackson Park; OPC Museum Building and other related new elements that may be perceptible within views from some vantage points within the historic district). However, views of these changes will only be perceptible from a limited area within the historic district; the visual and physical relationship between Hyde Park-Kenwood Historic District and Jackson Park and the Midway Plaisance will be maintained and these changes will not cause effects to features that contribute to the significance of the historic district or its setting. Therefore, the undertaking will have **no adverse effect** to the Hyde Park-Kenwood Historic District.

3.4.6.3 *Assessment of Effects on property*

3.4.6.3.1 Effects from Federal Actions

Most of the properties within the Hyde Park-Kenwood Historic District are located west of the ICRR Viaduct and Embankment and are a considerable distance away from the UPARR conversion and

replacement areas. However, the southeast corner of the Historic District (east of the Viaduct and Embankment) is located approximately 500 feet north (0.10 miles) of the UPARR conversion area and approximately 150 feet north of the east end of Midway Plaisance, for which a portion is considered for UPARR replacement land. Despite the close proximity of the action to the Hyde Park-Kenwood Historic District's southeast corner, neither the UPARR conversion nor replacement areas will cause any physical changes to the district or result in effects to features of its setting that contribute to its historic significance. The UPARR replacement areas on the east end of the Midway Plaisance and along S. Cornell Drive may introduce some changes that could be visible from vantage points within the historic district. Even with these changes, the Hyde Park-Kenwood Historic District will continue to maintain its close physical and visual relationship with Jackson Park and the Midway Plaisance and therefore, these visual changes would not affect the features of the property's setting that contribute to its historic significance.

The southeast corner of the Hyde Park-Kenwood Historic District is located at the intersection of E. 59th Street and S. Stony Island Avenue, where some proposed intersection improvements from the FHWA Action will occur. Sidewalk improvements are also proposed at all corners of the intersection. There will be no physical changes to the historic district associated with this work. These improvements will not cause any effect on the features of the Hyde Park-Kenwood Historic District's setting that contribute to its significance. In addition, there will be no perceptible audible changes (less than a 3 dBA change in noise level) associated with the proposed improvements.

No changes will occur to the uses of properties within the Hyde Park-Kenwood Historic District.

3.4.6.3.2 Effects from Reasonably Foreseeable/Probable Actions

The development of the OPC site, roadway closures, and relocated track and field may result in some new visual elements that could be perceptible within some vantage points within the Hyde Park-Kenwood Historic District. As shown in Photo 36 in Appendix C, the construction of the OPC Museum Building will likely be visible from some vantage points, particularly along the southeast corner of the historic district. The removal of the 8-lane rubberized-surface track will have no impact on the property's integrity of setting because the track is not a historic feature and was constructed after the district's Period of Significance. Despite some new visual elements, including views of the OPC Museum Building, the Hyde Park-Kenwood Historic District will maintain its close physical and visual relationships with Jackson Park, the Midway Plaisance, and their expansive landscapes.

3.5 Cumulative Effects

3.5.1 Methodology

A cumulative effect is the impact on the environment which results from the incremental impact of the Federal action when added to other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person takes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

This analysis of cumulative effect assesses the result of combining the effects of the undertaking and other past, present, or reasonably foreseeable actions potentially affecting the same historic properties at the same time. The effects of the undertaking are described in detail in earlier sections of this report. These incremental effects are further assessed in combination with the effects of unrelated activities that are current and reasonably foreseeable and may impact the same historic resources; these activities include:

- 1) traffic signal interconnect improvements along Stony Island Avenue
- 2) improvements to separate the Lakefront Trail
- 3) the relocation and reconfiguration of baseball facilities in Jackson Park
- 4) the Great Lakes Fishery and Ecosystem Restoration (GLFER) project
- 5) improvements to the Osaka Garden on the Wooded Island
- 6) other improvements on the Wooded Island
- 7) potential improvements of the Columbia (Clarence Darrow) Bridge

These seven activities are independent of the Federal actions that required the Section 106 process to be completed. If any of these separate projects qualifies as a federal undertaking, it will undergo its own Section 106 process before the individual project receives federal approval.

The current condition of the potentially affected historic properties reflects past effects on the historic properties and in turn informs the assessment of potential cumulative effects from the undertaking. Detailed descriptions of current condition, taking into account past changes, are provided in the 2018 Historic Property Inventory (HPI) (www.tinyURL.com/JPIImprovements). For example, the HPI includes extensive analysis of how Jackson Park and Midway Plaisance have undergone substantial change over time while maintaining historic value and function. As established by the HPI and summarized in Section 3.3.1 of this document, the combination of changes made to date have not impaired the integrity of the existing character-defining features reflecting the original design principles for the park.

3.5.2 Analysis

As explained in Section 3.3.2.3, the undertaking will have an adverse effect on the historic landscape of Jackson Park and Midway Plaisance, and these effects will overlap in time. These effects arise from the Federal actions themselves and from the reasonably foreseeable actions following from those actions (collectively, these actions are “the undertaking”). As detailed in this report, some aspects of the undertaking will have negative effects while other aspects will have minimal or no effect. The

components of the undertaking with negative effect on the historic landscape include: proposed changes to the Midway Plaisance, OPC site development, and certain roadway closures. Others, such as Hayes Drive Reconfiguration and the changes along Marquette Drive and Cornell Drive, deviate from the historic design and have primarily negative effects. Those with minimal or no effects include: Lake Shore Drive improvements, and bicyclist and pedestrian improvements.

The undertaking will result in certain adverse effects on the historic landscape of Jackson Park and Midway Plaisance. The combined effect of the undertaking is further analyzed in the context of effects from the unrelated activities enumerated in Section 3.5.1. Several of these projects are noted in the 2018 South Lakefront Framework Plan. (<https://www.southlakefrontplan.com/>)

- *Stoney Island Avenue Traffic Improvements*

Chicago Department of Transportation (CDOT) is upgrading the signal equipment and communication along Stony Island / Cornell Drive / 57th Drive from 95th and Stony Island to 57th and Lake Shore Drive. The project will upgrade existing traffic signal equipment (poles, mast arms, lens, cabinet, conduit) and will interconnect the traffic signals to improve operations along Stony Island, connecting into Lake Shore Drive. Where restoration is required for new traffic signal poles / conduit runs, the project will also upgrade existing ramps consistent with the Americans with Disabilities Act.
- *Lakefront Trail Separation*

The Lakefront Trail connects 2,792 acres of parkland in 6 parks including Jackson Park. The trail is located east of Lake Shore Drive from 56th Street to Marquette Drive and north of Marquette Drive from Lake Shore Drive to 67th Street within Jackson Park. Considered a major recreational component in parks and a transportation network, the Lakefront Trail Separation project sought to alleviate areas of congestion by separating bicyclists from other trail users. The newly separated trail includes an 18-mile bike trail and lakefront path. The separation project is complete.
- *Baseball Facilities*

The South Lakefront Framework plan includes improvements to area north of Hayes Drive and east of the Wooded Island. Currently there are two natural grass baseball fields and an overlapping natural grass soccer / football field. Preliminary design is in the early stages for two new senior baseball fields and renovations of one senior baseball field.
- *Great Lakes Fishery and Ecosystem Restoration (GLFER)*

As part of an effort to restore bird, fish and wildlife habitat within the natural areas of Jackson Park, the Chicago Park District and the United States Army Corps of Engineers (USACE) entered into an agreement to initiate a 5-year ecological restoration project authorized through the Water Resources Development Act, Section 506, Great Lakes Fishery and Ecosystem Restoration (GLFER). The project aims to create or enhance nearly 147 acres of native habitat within the park and along the Lake Michigan shoreline. The project includes 24 acres of new natural areas and the installation of over 600,000 native plants that will increase the biological diversity of the park and provide critical habitat and beautiful scenery for park visitors. In addition, to improve

access and circulation throughout the park, the project includes installation of overlooks along the water's edge, new pathways, and the reconstruction of existing pathways on Wooded Island.

Project design started in May 2014, and construction began in January 2015. Improvements surrounding the lagoons, and work in areas north of Hayes Drive and west of Lake Shore Drive, are complete. In general, all the areas north of Hayes Drive have been planted, along with the removal of invasive plant species. The areas south of Hayes Drive have had the invasive plant species removed, but proposed replacement plantings have not been installed.

- *Osaka Garden and Other Improvements on the Wooded Island*

Improvements to the Wooded Island and Osaka Garden are part of the Wooded Island Plan, which was incorporated into the South Lakefront Framework Plan. The plan includes improvements to the perimeter fence, a new main gate, pathway enhancements, new plantings and tree pruning, landscape lighting, feature stone placements in the garden, and a new teahouse. The plan also includes the addition of an overlook that will allow for viewing of an existing art installation and new berms surrounding the installation to integrate the site with the adjacent natural areas. These plans are still in design and are subject to funding availability and continued design refinement.

- *Clarence Darrow Bridge*

The Clarence Darrow Bridge is currently closed to all traffic, and the City of Chicago Department of Transportation (CDOT) is evaluating potential alternatives to accommodate bicyclists and pedestrians. Built in 1880 and modified in 1895, CDOT's evaluation has concluded that the bridge is so structurally deficient that it cannot be rehabilitated without affecting its historic integrity. Based on its condition, CDOT is considering rehabilitation or replacement of the bridge while retaining historic design elements and materials to the maximum extent possible. CDOT intends follow the Department of the Interior's Standards for the Reconstruction of Historic Properties for the project.

The Stony Island Interconnect project will improve traffic operations and modernize signal equipment along Stony Island Avenue. These changes will not alter features of Jackson Park or the Midway Plaisance. The Lakefront Trail Separation Improvements project generally corresponds to existing and historic circulation within the property and minimally alters the historic property. The baseball field complex improvements alter rehabilitated parkland around the Hayes Drive Bridge but minimally alter characteristics of the cultural landscape that contribute to the significance of the property. The ongoing GLFER program rehabilitated the historic character of vegetation and other aspects of the site (cultural landscape) while accomplishing the objective of ecological restoration. The continuation of the GLFER project aligns to SOI standards and rehabilitates portions of the historic property. The Osaka Garden Improvements project seeks to enhance the historic garden and context, while preserving features that contribute significance to the historic property. Other Wooded Island Improvements will minimally alter characteristics of the historic property. Altogether, the foregoing projects will minimally alter characteristics of the Jackson Park Historic Landscape District and Midway Plaisance (cultural landscape)

that contribute to the significance of the property. They have beneficial and no adverse effects. Accordingly, the noted current and reasonably foreseeable activities do not provide context in which the undertaking would contribute cumulative effects to Jackson Park and Midway Plaisance.

With respect to Darrow Bridge, the potential adverse effect is being evaluated in a separate Section 106 process, which has not reached conclusion. The undertaking at issue in this document will be considered in the cumulative impacts assessment for the Clarence Darrow Bridge project, but at present the bridge project analysis has not resulted in a finding of effect. Thus, no cumulative effect is currently identified for this undertaking in connection with the potential improvement of Darrow Bridge.

Among the current and reasonably foreseeable activities noted above, only the Stony Island Interconnect has the potential to cause effects to properties outside Jackson Park and Midway Plaisance. However, Stony Island Avenue has been previously widened and altered, and many of the properties along Stony Island Avenue have diminished integrity of setting. Thus, this undertaking does not contribute cumulative effects outside Jackson Park and Midway Plaisance in the context of the activities listed above in Section 3.5.1.

3.5.3 Cumulative Effect – Conclusion

The analysis of this undertaking in conjunction with past, present and reasonably foreseeable actions identified a cumulative adverse effect on the historic property of Jackson Park and Midway Plaisance. The cumulative effect arises from combining the effects of the undertaking on the same historic resource at the same time, given the resource's current condition taking into consideration the effects of past activities. Other current and reasonably foreseeable activities have indeterminate or beneficial effects in whose context the undertaking does not contribute cumulative effects to historic properties within or outside Jackson Park and Midway Plaisance. Some of the reasonably foreseeable activities listed above in Section 3.5.1 may be further analyzed in a future Section 106 process that would take into consideration the potential for cumulative effects with this undertaking.

4.0 Public Involvement and SHPO Consultation

Throughout the Section 106 process, opportunities are made for the public and Consulting Parties to provide input. A current list of the identified and interested groups included as Consulting Parties for the projects can be viewed under Public Involvement in Appendix E. Updates to this list are posted to the project website (www.tinyURL.com/JPIImprovements) as necessary.

On December 1, 2017, a Consulting Party Kick-Off Meeting was held to discuss the Section 106 process, the APEs, and a preliminary summary of historic features within the APE, as documented in the HPI. Input received was evaluated and incorporated into the final delineation of APE boundaries and historic resources identified.

The second Consulting Party meeting was held on March 29, 2018 to discuss the results of the historic properties identification and the next steps in the Section 106 process. Prior to the meeting, the Archaeological Report and the draft HPI were distributed to consulting parties and the public for review and input. Audience members who attended the meeting asked several questions during the question and answer session following the meeting presentation. Twenty-nine comment letters were received outside of the meeting during the comment period ending April 19, 2018. Input received during the question and answer session of the meeting as well as during the 30-day comment period is summarized on project website (www.tinyURL.com/JPIImprovements).

The SHPO provided concurrence on the finding of no eligible archaeological sites for the NRHP as described in the Archaeological Report on March 28, 2018 (see Appendix for correspondence). The HPI was revised based on comments received from the public, SHPO, and other reviewing agencies. A final HPI was submitted to the SHPO for approval on June 6, 2018. The SHPO provided written concurrence on the determinations of eligibility listed in the final HPI on July 10, 2018 (see Appendix D for correspondence).

This Assessment of Effects (AOE) will be made available for the public, Consulting Parties, ACHP and SHPO for a 30-day review and comment period. Consulting Party Meeting #3 is anticipated to be held in Summer 2019 to discuss the results of this report and gather input from attendees. Comments collected from the meeting and during the 30-day comment period will be documented and summarized within this section of the final AOE. A meeting summary and responses to comments will be included on the project website (www.tinyURL.com/JPIImprovements) once available. The final AOE will be made available to consulting parties and the public after the comment period is concluded and comments received have been addressed.

5.0 Minimization and Mitigation of Effects

The following summarizes efforts made to minimize or avoid impacts or effects to historic properties.

NPS Action

The City of Chicago selected UPARR replacement site adheres to criteria set forth by the NPS, which generally considers sites proximate and of similar quality and use to the area of proposed conversion. The future public process regarding the changes on the Eastern Midway will carefully consider the historic nature of the Midway Plaisance and seek to minimize any potential effects to historic properties, pathways, and plantings, to the extent possible.

FHWA Action

As mentioned in Section 1.3, the FHWA considered a wide range of alternatives to avoid and minimize effects to Jackson Park while meeting the objectives of the project. As part of the alternative development process, planning efforts to minimize potential effects generally included the following:

- minimization of additional turn lanes to avoid excess capacity,
- minimization of through and turn lane widths,
- roadway reconfigurations to reduce widening needs and utilize existing roadway footprint, and
- minimization of roadway median barrier widths.

The specific minimization efforts considered for the transportation improvements are documented on the project website (www.tinyURL.com/JPIImprovements).

The proposed transportation improvements also considered strategies to preserve or enhance the historic character of Jackson Park. These strategies generally include:

- consideration of historic roadway and pedestrian path alignments,
- minimization of potential tree impacts or removals, particularly larger trees of specific species,
- reduction of proposed grading to preserve landscape qualities and existing berms, and
- restoration of existing cladding on the 59th Street Inlet bridge.

OPC Site Development

Neither FHWA nor NPS has direct or indirect jurisdiction over the OPC Site Development, however, the City and the project proponents have incorporated minimization efforts into the design of the project to address the historic resources and character of the historic property. The OPC is proposed to be sited in the Park and neighborhood interface of the Park Perimeter Area which will minimize impacts to most historic resources and areas within the core of the historic property including the Lagoons, Fields, Lake Shore, and Museum Grounds Areas of Jackson Park. The project footprint has been developed to affect a relatively small area of the total acreage of the historic property (approximately three percent).

The height of the prominent OPC Museum Building enables a smaller footprint within the historic property than if the building was shorter. Also, the orientation, location, and materials of the Museum

Buildings have been developed with attention to views from the historic property and the skyline surrounding.

The visibility of other new OPC buildings within the park landscape has been minimized and the prominence of landscape scenery enhanced through the location of buildings, the design of green roofs, and the partial submergence of approximately forty percent of the project's occupied space, and underground parking. Further accommodation for the expression of green space within the footprint of the project involves the placement of subtle berms and planted buffers to minimize impacts to historic views and vistas within the historic district.

The changes associated with the OPC prioritize pedestrians over vehicles as well as internal circulation within the historic property over commuter traffic through the property. The shift is not a replication of historic design but enhances the prominence of landscape scenery. The design of circulation increases accessibility in the Western Perimeter of Jackson Park. The proposed garden design to replace the Perennial Garden/Women's Garden near the Midway Plaisance, for example, provides full accessibility and a safer to approach from surrounding parkland. At Cornell Drive between 59th and 62nd Streets, the conversion of a portion of the roadway to a pedestrian walkway associated with the OPC results in removal of high-speed traffic and reduction of non-historic road widths along Cornell Drive. The new walk generally follows the alignment of Cornell Drive, offers a wide pathway to interpret the historically wide drive, and provides for views over the West Lagoon.

Road closures incorporate new pedestrian walks and the remainder of the former roadways are converted to greenspace in most cases. The conversion from vehicular roads to pedestrian walks typically follows the alignment of the historic roadways including at the historic triangular intersections of Hayes Drive and Marquette Drive and at Marquette Drive and Richards Drive.

6.0 Conclusions

As summarized by this document, Table 4 summarizes the effect findings for each historic property associated with the undertaking. The result of the Assessment of Effects is that the undertaking will have an **Adverse Effect** to historic properties.

Table 4: Summary of Effect Findings

Historic Property	Effect Finding
Jackson Park Historic Landscape District and Midway Plaisance	Adverse Effect
Stony Island State Trust and Savings Bank/Stony Island Arts Bank	No Adverse Effect
William Dexter Three-Flat	No Adverse Effect
Island Terrace Apartments	No Adverse Effect
Hyde Park Academy High School	No Adverse Effect
Jackson Park Terrace Historic District	No Adverse Effect
Hyde Park-Kenwood Historic District	No Adverse Effect
South Shore Country Club Historic District (Currently known as the South Shore Cultural Center Park)	No Effect
South Shore E. 67 th Street Apartment Historic District	No Effect
Residences at 6700 S. Crandon Avenue	No Effect
Shoreline Apartments	No Effect
Residences at 2201-2211 E. 67 th Street	No Effect
Leonard Graff House	No Effect
Dr. Paul Schutz House	No Effect
Morris N. Fox Three-Flat	No Effect
Residences at 6701 S. Constance Avenue	No Effect
Tower Court Apartments	No Effect
Hyde Park East Historic District	No Effect
Bret Harte Elementary School	No Effect
Windermere East Hotel/Apartments	No Effect
Jackson Towers	No Effect
Promontory Apartments	No Effect
The Flamingo on the Lake	No Effect
Jackson Shore Apartments	No Effect
Shoreland Hotel	No Effect
Promontory Point Historic District	No Effect
Helstein House	No Effect
Residence at 5812 S. Blackstone Avenue	No Effect
Stein Building	No Effect
Johnson House	No Effect
Center for Continuing Education (Graduate Student Housing/Keller Center)	No Effect

Historic Property	Effect Finding
Public Administration Building (Chapin Hall)	No Effect
St. Paul's Universalist Church/Shankman Orthogenics School	No Effect
University of Chicago Power Station	No Effect
E. 62 nd Place Firehouse	No Effect
Pridmore & Stanhope-designed Greystone	No Effect

As part of the NHPA Section 106 process, the project will continue to seek additional opportunities to reduce effects and impacts to historic and environmental resources. The City continues to investigate other potential mitigation strategies that will be further developed as part of the next stage of the Section 106 process, addressing adverse effects.

In the final step of the Section 106 process, the FHWA and NPS will explore measures to avoid, minimize, or mitigate adverse effects to historic properties from the Federal actions and to reach agreement with the Illinois State Historic Preservation Officer and the Advisory Council on Historic Preservation on measures to address them. Agreement on these measures will be documented in a Memorandum of Agreement (MOA). Consulting parties who may have responsibilities for implementing mitigation measures, such as the Illinois Department of Transportation and the City of Chicago, will be invited to sign the MOA. Other consulting parties will be invited to concur in the MOA, however, the refusal of any party invited to concur in the MOA does not invalidate it.

Measures necessary to mitigate adverse impacts from the Federal actions will be incorporated into the action and are eligible for FHWA funding when (1) the impacts for which the mitigation is proposed result from the Federal action; and (2) the proposed mitigation represents a reasonable public expenditure after considering the impacts of the action and the benefits of the proposed mitigation measures.

7.0 References

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